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EUTHANASIA, AS INTERWOVEN IN HUMANITARIAN AND LEGAL FACETS: AN ANALYTICAL STUDY WITH SPECIAL REFERENCE TO INDIA

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ABSTRACT

Euthanasia, a word that was first given meaning to by Suetonius, a historian, was used to describe a death without suffering, thus justifying the derivation from the Greek Language, ‘euthanatos’ meaning “good death”, whereupon the subject is given a means to attain unnatural death, owing to severe turbulence in the quality of living caused due to chronic ailments. With fast globalization, the moral and legal grounds of euthanasia have been actively debated upon over the years, as is imperative. Euthanasia, or mercy killing, as a concept is viewed to be a part of many scripts and umpteen number of sayings from philosophers have rallied for this idea which gives us the notion that there have been discussions pertaining to the issue of assisting someone’s death throughout ages. Ethical high ground was being lobbied by many medicinal professionals that claimed assisted suicide is directly and fundamentally in contrast to the “Hippocratic Oath” that the medical professionals undertake. The concept, expectedly, comes with a spectrum of legal implications interlaced with humanitarianism, the juxtaposition of which is the essence of the article. The introductory threshold of the topic being established, the paper aims to study, using exploratory & interpretive research methodology, the legal & moral positions in several developed countries as of today in comparison to the reasons behind the strong opposition of active euthanasia in India. International debates upon the forum of International Human Rights Law will be studied to whittle out detailed viewpoints in the main

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structure of the study. The evolution and development of euthanasia as it made its way into the Humanitarian Law, and several medical practices will be traced down under the light of religious, moral, legal and humanitarian arguments and case laws, as a subject that intertwines law and humanitarian justice, thus structurally defining the scope of the paper.

Keywords: Assisted Suicide, Indian Legal System, Legalization of Euthanasia, Active and Passive Euthanasia, International Human Rights

INTRODUCTION

Euthanasia is arguable one of the most debated topics globally. Physician-assisted suicide, or better known as mercy killing, is a process whereupon any person suffering from a chronic ailment which majorly impacts their quality of life decides to put an end to their own life, by expressly stating so or through his immediate relations. Press media, government, judiciary and politicians alike have expressed views that range widely in the spectrum of support and oppose. It becomes essential to understand that as a multi-cultural, diverse environment as India harbours calls for several stances by various segments of the citizens, the sources of which will be elaborated upon as the paper unfolds. In the current scenario, euthanasia is delicately interwoven into the subtle intricacies of both law and humanitarian aspects. The discussion sees the individuals who rally for a person's entitlement to a 'decent death' during a period based on their very own preference, thus standing against those who believe in the divine sanctity of human life.² Mercy Killing is a two-fold aspect, consisting of active and passive euthanasia. *Active Voluntary Euthanasia commands the express will of the patient or their relatives in order to put an end to their life, by methods including but not limited to Lethal Injection, Asphyxiation etc., as opposed to Active Involuntary Euthanasia whereupon, the medical professions do so without the request expressly made.*³ Passive Voluntary Euthanasia, which is recognized in several countries including India refers to a mere aid in the process of putting an end to life, by means of withholding the required treatment or by withdrawing life support or the like, in order to rescue the ailing person from unnecessary physical and mental torment, as opposed to passive involuntary euthanasia which refers to the same without the express will of the patient. The Supreme Court of India, by means of several ground-breaking judgments which will be examined in the main structure, in recent times showed an affinity towards delivering a

²Natasha Cica, Euthanasia- the Australian Law in an International Context: Passive Voluntary Euthanasia, (edn. 1996-97) part 3,

³*ibid* [132] paragraph [2-3]

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judgment on the rather sensitive topic of Euthanasia or in common parlance also known as Mercy killings which is generally demanded by people suffering through terminally ill situation after which according to medical professionals the patient has reached a stage from where going back is rather not possible and only a painful further existence is awaited by such individuals. However even after much deliberation the Indian Legal System only seems to be confident whilst allowing the Advent for passive Euthanasia in the country, the Active mode of the said act seems to be something yet to be deliberated upon by the stakeholders in this matter to gain a confident green light for the same. While this is the concurrent situation in India right now, it has become rather imperative to seek and understand the global and historical scenario that rests with the topic to understand the situation that we are possibly dealing with here.

BACKGROUND AND IMPORTANCE

There is a heated debate on this issue and in the past five years was constantly noted as the biggest bioethical issue wherein moral high ground was being lobbied by many medicinal professionals who wanted to preach that allowing one to end their life or rather the doctors themselves injecting something in their system to end their lives certainly was something directly in contrast to the “*Hippocratic oath*” that everyone worldwide who is part of the medical community undertakes to ensure impartial service to every patient that seeks for help. Although there is another Lobby which prevails mostly of illegal practitioner who are firm with their belief that the moral should be observed for men or women who are terminally ill and hence are living a life on essentially borrowed life where the most basic of their function cannot be enjoyed by them and hence are essentially a burden on relations without whom they are immobile. Be that as it may, It is clear is that guidelines do as of now exist to allow the pulling back or retaining of clinical treatment in specific conditions, whether or not such practices are portrayed as passive or go against the beliefs of such professionals .This after initial criticism has been seen growing acceptance with many cases from all over the world coming into light that certainly garnered sympathy from everyone who observes the affected person's ordeal.⁴

Euthanasia as a concept is rather seen as something that has been observed to be a part of many scripts and umpteen no of sayings from philosophers have rallied for this idea which does give us the notion that there have been discussions pertaining to the issue of assisting someone's Death throughout ages. Felix Adler was one of the first to point this out and as he stated that it

⁴India l, 'Euthanasia In India'(2020)

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seemed pertinent from the Ethical culture framework to argue that assisted suicide is the way to go for people suffering from chronic Diseases. In a strictly religious sense, the Roman Catholic Church condemns Euthanasia as something that is perceived to be morally wrong, The orthodox church in America opposed this as “Deliberate cessation of Human life, as such must be condemned by Murder. The Canadian church has also condemned assisted suicide as the way to go currently as in affirmative nod with the churches in the United Kingdom. Other Abhramic religions such as Islam also Holds the same Concept whilst talking about Majority. In addition to the aforementioned, Hinduism also features a sliver pertaining to willful death, otherwise known as suicide or *aatmagatha*⁵, whereupon any deed amounting to voluntary termination of one’s own life is condemned. For this very reason, the religious *sutras* advocated against suicide.⁶

EUTHANASIA AS WOVEN THROUGH LEGAL AND HUMANITARIAN FACETS

Suicide and Euthanasia:

There is certainly a scope of thought to delve into which talks about the presence of Right to die in context to Right to life. Now Right to life is something way beyond in about every nations constitution, it is regarded as an inalienable right that is bestowed among all of us who have been born as humans. Some people do have considered this aspect of our existence where probably the area of concern of the inception, its subsequent existence and the final blow all are to be married together to understand the larger interplay that touches upon all of them individually as well as a whole. Right to life certainly purports the fact that one requires to be aware of their life being fostered by the law through a law that makes it a certainty resultant of which they have the security regarding their life ahead. Now some might rebut that murder or homicide or any crime that is fatal enough to kill a person is in contrast to what was mentioned right now, However if closely inspected one would certainly get the idea that the resultant punishments subscribed for any such dreadful act is certainly a weight that has been kept on the issue to keep the possibility of such occurrences lesser as they are today.⁷The motive of any law that is prescribed to the people at any time is certainly with the intent to keep the society safe and every law is generally in accordance to the happenings and the social structure and requirement of that region at that time which is why it becomes pertinent to believe that even

⁵ C Lippner, *Euthanasia: Traditional Hindu Views & the Contemporary Debate*, (NYS, 1995) p. 16

⁶Crawford SC, *Dilemmas of Life & Death*, (State University of New York Press, 1995) p. 112

⁷Math S, and Chaturvedi S, 'Euthanasia: Right To Life Vs Right To Die' (*Ijmr.org.in*, 2020)

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something like “**Mercy Death**” has been a thought around concept which obviously when seen through the prism of “**Right to life**” and probably Suicide being not long ago kept at that stake of being considered equivalent to a crime are certainly instances that keeps the concept in the grey and requires to be understood in an empathetic way. **Section 309** of the Indian Penal Code criminalises attempted suicide as well as any form of suicide assistance , section 309 states: As per the provisions whomsoever attempts to commit suicide and does any act towards commission of inciting someone else’s suicide will be held as a defaulter and subsequently accordingly charged and punished, Now these steps certainly provides one with a reasonable explanation on how the law has essentially tried to keep everything well rounded to keep the origins safe for people, but doesn’t the question arise where we have to take a look back at what has happens if there isn’t a law that talks about suicide and also to understand the intricacy of these laws, It certainly can be deemed as funny to note that how both somehow contradict each other, whereas Euthanasia is trying to provide Death to anyone Who wants to give up on life due to a situation they deem fine whereas section 309 completely turns a blind eye on it and expects people to be fearful of an easy death. The initiation of Article 309 was although introduced by the Rajya Sabha considering that any person who [possibly commits suicide shall be deemed to be suffering off mental illness] hence should not ne put behind bars. This somehow provides us with a tangent that the life of an individual as been considered as essential to be understood before being harmed and suicide being criminalized is rather an invitation to means to undertake it in ways that rather provide finality to the whole process rather than the latter. Hence the arguments are more multi dimensional than they initially appear to be. This hence somehow obtains the liberal rationale of understanding a persons condition subject to their deterioration in health be it physically or mentally as a matter of fact the possibility of their potential revival provided their medical scenario currently with regard to a potent treatment for their concurring issues. It further becomes pertinent to consider the depth that could be considered as sufficient to allow a person the answer of euthanasia to end their life for once. Are their medical conditions which on an average being expected to be cured of can be understood to be rather somewhat out of reach of the Medical fraternity for the foreseeable future, or the will of the patient does not allow his/her conscience to live any further without their full functionality to this. This in no means is to undermine anyone’s suffering currently or their reasons to choose the path of suicide or rather euthanasia but certainly it does pose a question of a way that could be less disturbing and decisions around which could be made to minimize the effect of the following on their close ones. It certainly is rather a very obvious

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fact that the people involved are to be seen through the scope of completion of the right to live in whose process death is the finality life goes on to serve.

Dilemma of Active or Passive Euthanasia

Currently, there are two types of deaths that could be given provided that a patient essentially decides to undertake euthanasia and also the treatment is available in that country (Passive euthanasia is available in India), there is still an ongoing debate on the way death should be given to the patient. So in a Nutshell if thought of it, it basically means that under passive euthanasia the person could be in either situation wherein he or she is generally relieved off the life support by the doctor on agreement with everyone else currently involved with the patient, While on the other hand there is also another major form of relieving a person which is through administering a fatal enough drug that potentially ends the life of the Person. Now again there certainly is a lobby which strongly believes that the person should be if relieved be through a treatment which at least is subtle in nature and if a fatal drug seems like the answer that means there still lies a scope of exploring a possibility to save their life. A rather protruding argument or thought that is that HOPE or mental toughness is what is required to be given to the world in general instead of a fading hope and allowing people to turn in their own lives when according to them the going gets tough. Many countries have also faced a lot of backlash from other sources such as Ethnic and religious groups who have raised concerns about the requirement of how administering someone with an external agent to speed up the process of death is equivalent to administering death and when there was a certain possibility of that being readily achieved in Netherland, the majority of Catholic community detested it and talked about the commandment of “**Thou shall not kill**” which practically is also a teaching in about every possible religion. Talking about the different such conditions there has been different scenarios.

COMMENDABLE STANCES ON ACTIVE AND PASSIVE EUTHANASIA ACROSS THE GLOBE

The takes have changed time and again with the changing of social scenarios and understanding, some European countries have allowed the act of Euthanasia to be legalized while there are countries around the world that understand it as nothing short of misery. Netherlands was the first country in the world to confer legal status upon physician-assisted suicide/euthanasia in the year 2002. The penal code of Netherland explicitly states that killing a person even with his consent would attract the punishment under law. However, the Court took

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it upon itself to interpret the said law in a way that provides for physician-assisted suicide, subject to the conditions of dire necessity and patient's willful consent, after all alternatives are exhausted, in the expert opinion of a medical professional. Euthanasia can be seen through only by a medical professional after seeing to the fact that all essentials check out.⁸

Countries such as Canada and parts of the states or even Australia have given allowance on to the patient themselves to take their own lives if they deem that to be necessary hence freeing doctors and paramedics involved any burden for this.

The House of Lords also took a part in the affirmative direction, and even affirmed the legality of passive involuntary euthanasia keeping in mind the patients in a persistent vegetative state, and has even given judgments in the course.⁹

In USA, there is a firm differentiation between active euthanasia and passive euthanasia. The medical professionals in the country will not be held liable if they, at the request of the patient or their representatives, withdraw or withhold life sustaining medical procedures or treatment. On the other hand, active euthanasia is prohibited, and illegal in the USA. In the case of *Washington v. Glucksberg*¹⁰ the Supreme Court made ruled that euthanasia was illegal. However, Oregon and California passed Bills in 1994 and 2005 respectively, allowing physician-assisted suicide, on parlance with the Death and Dignity Act and the End of Life Option Act.

The Switzerland Supreme Court however begged to differ, making a thought provoking statement to be thought about instead. "Death is not a right, it is the end of all rights and a fate that none of us can escape. The ultimate right we have as human beings is the right to life, an inalienable right not even the person who possesses it can never take that away. It is similar to the fact that our right to liberty does not give us the freedom to sell ourselves into slavery. In addition, this right to die does not equal a right to 'die with dignity.' Dying in a dignified manner relates to how one confronts death, not the manner in which one dies since history recounts many situations of individuals facing degrading deaths in a dignified way "The former is certainly at loggerheads with the current scenario in India where presenting the people through Article 21 is showcased. Hence, we consider this a plausible option where the

⁸Aman Chibber, 'Euthanasia and Human Rights' via <http://www.euthqanasia.com>, accessed on 03rd May, 2020

⁹Dr Jaswal, *Civil and Military Law Journal*, [46(2) 2010] p.90

¹⁰521 US 702 (1997)

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concurrent scenario takes us to reading between the lines and giving it a shot with differentiating individual cases as their own but rather in contemplation.

Belgium, in 2002, took a bold stance made euthanasia legal via Belgium Act on Euthanasia while also keeping in place strict rules pertaining to receipt of approval for the same, mainly subject to the fact that the ailment is causing unbearable physical and mental torment.¹¹

The above illustrates the genesis of euthanasia, both active and passive, in several leading countries, thus providing a classified spectrum for analysis.

EUTHANASIA IN THE INDIAN SCENARIO

Not unlike the common global perspective, desired death is pointed at to have increased the instances of suicide idealization and lack of tolerance for pain, or as direct disobedience to the divine order. The impact of such major perpetual conditions on a person's mental wellbeing and physical stamina is often overlooked by several of those that preach against euthanasia. Having examined the several dynamics concerning euthanasia, the paper proceeds to look into the legal standing of Euthanasia in India. In India, any and all cases of euthanasia would immediately attract S.300 of the Indian Penal Code, 1860. However, it becomes pertinent to note that S.300 provides for an exception whereby, consent of the victim, when proven, does not incur the wrath of S.300 but is governed by S.304 which provides for culpable homicide not amounting to murder. Involuntary euthanasia is illegal and punishable, as it opens a window to many loopholes that inadvertently lead to masked crime and misuse. In India, the Right to Life has been placed at the top most spot, and cannot be isolated; and the Right to Die is not a fundamental right as under the provisions of Art 21, which provides for the Right to Life. The following section examines several landmark cases that paved a precedential path for euthanasia as we see it today. The question as to the inclusion of Right to Die in the Indian Constitution was first heard in the case of State of Maharashtra v. Maruthi Shri Dubal¹², wherein the Hon'ble Bombay High Court held that the right to die is inherent in the right to life, which eventually lead to the Court striking down S.309, which renders suicide unconstitutional, provided that the circumstances demanding assisted suicide are strictly due to a medical condition or ailment, arising not out of natural situations. The decision of the Court in this case was soon upheld in

¹¹: India I, 'Euthanasia In India' (*Legalservicesindia.com*, 2020)

¹²AIR 1977 SC 411

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the case of Rathnam v. UOI¹³. Similarly, in State v Sanjay Kumar Bhatia,¹⁴ the Delhi High Court held that S.309 would no longer be counted as valid. This issue was reconsidered by several sections of the public alike, along with comments and criticism. In the well-known, landmark case of Gian Kaur vs State of Punjab¹⁵, whereupon the Court held that as per the provisions of Art 21, Right to Life doesn't include Right to Die, and stated that the same must not be read into between the lines of the express provision. Furthermore, in regard to the Indian Medical Council Act of 1956, euthanasia is given the value of an unethical practice, in any case with the exception of those wherein only the life support is withdrawn, which prompts cardio-pulmonary functions, and the same is justified by a qualified doctor's opinion. The concept was investigated in the 196th report of the Law Commission. "The Law Commission addressed many question namely, as to who are competent and incompetent patients, as to what is meant by informed decision, what is meant by best interests of a patient, whether patients, their relations or doctors can move a court of law seeking a declaration that an act or omission or a proposed act or omission of a doctor is lawful, if so, whether such decision will be binding on the parties and doctors, in future civil and criminal proceedings etc. Law Commission recommended having a law to protect patients who are terminally ill, when they take decisions to refuse medical treatment, including artificial nutrition and hydration."¹⁶ This report specifically focused on the fact that even though the relatives of the patient have consulted a specialist for the same, it must be ensured that such specialist is in strict adherence to the regulations issued by the Medical Council of India, in order to avoid gross misuse of power and ward off any damages arising out of the same. Furthermore, the report laid down a clause whereby it is mandatory for the doctor to maintain records of denial of treatments by the patients, even in cases of a decision made by a scantily informed patient. The medical professional is bound to record all such denials, refusals, or withdrawal of medical aid by all such patients; this record will mainly consist of the reasons of withdrawal or incompetence, the expert medical opinion and the decision of the relatives of the patient, in case the patient is unable to speak for themselves. However, in a case where the family of the patient is not on par with the decision taken by the patient, they shall approach the High Court with jurisdiction, until which time any medical advances contrary to the same are put to halt.¹⁷

¹³1994 (3)SCC 394

¹⁴1985 Cri LJ 931 (Del)

¹⁵1996(2)SCC 648

¹⁶Ambalika J, Concept of Euthanasia in India- A Socio Legal Analysis, International Journal of Law and Legal Jurisprudence Studies (Volume 2, Issue 3) p. 217

¹⁷196th Report of the Law Commission of India, [Protection of Patients and Medical Practitioners], March 2006
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The concept of euthanasia was given a whole new element of consideration by the Hon'ble Supreme Court in the case of Aruna R. Shanbaug v Union of India¹⁸. This case acted as a threshold to the reinvention of the topic into the minds of several people. In this case, the petitioner, Aruna Shanbaug, who worked as a nurse in Karnataka, and then in 1973 as a junior nurse at a hospital was sexually assaulted by a staff member, and was resorted to a Persistent Vegetative State, and was virtually not alive for 37 years. A friend of the petitioner, who is a journalist, filed a petition so as to obtain permission to put down Aruna Shanbaug via euthanasia. The Hon'ble SC set up an investigative body to look into the merits of the plea for Euthanasia by the friend of Aruna Shanbaug. What initially came as a disappointment, the Supreme Court dismissed the petition for Euthanasia, although in its eventual ruling, it provided for the acceptance of Passive Voluntary Euthanasia, and made it explicitly clear that any instance of active euthanasia, whether voluntary or involuntary, is strictly punishable under the Indian Penal Code. Having laid it down, the Court further laid down the following guidelines that would act as a valid statute up until the time that a Statute is brought about by the parliament:

1. "A decision to discontinue life support should be taken either by the parents or the spouse or other close relatives. In the absence of any of them, such a decision can be taken by a person or a body of persons acting as a next friend. Also, the decision taken by the doctor attending the patient should be bonafide one and in the best interest of the patient.
2. The Supreme Court made it mandatory to take approval from the High Court concerned, even if the decision is taken by near relatives or doctors or next friend to withdraw life support, because in India the possibility of mischief being done by relatives or others for inheriting the property of patient cannot be ruled out.
3. The Court also prescribed the procedure to be adopted by the High Court when such an application is filed. The Court propounded that a Bench of at least two judges should decide this application, after taking opinion from a committee of three reputed doctors to be nominated by the Bench after careful examination of the patient by those doctors. The Court also directed that notice should be issued to the state and close relative, next friend, after hearing them, the High Court should decide this application."¹⁹

¹⁸2011(3)SCALE 298

¹⁹Ibid note 11, paragraphs 130-140

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With this, the Supreme Court set a dynamic precedent, even though it disallowed mercy killing in the instant case, by recognizing passive euthanasia, it has proved to pave a path to dignified death of several people.²⁰

One cannot undermine the necessities or desperation to be free from the physical and emotional torment of another person; however, it becomes essential to understand the legalization of passive euthanasia is in no way glorification of suicide. As aforementioned, struggles of one person cannot be held as a yard stick for another person's pain, similarly, the status of a mentally ill person must also be considered. For instance, as person undergoing chronic depression or mental issues alike, they tend to lean towards the termination of their life. It then becomes important for the law to intervene, to minimize the losses of life, and thus curb active euthanasia so as it conserve the public life, as is backed and encouraged by several Psychiatrists across the world.²¹

Reasons for Pushback against Legalization in India

India was always a country that majorly believed in the divine sanctity of life, and the most popular religion being *Hinduism*, several Indians believe that suffering is only a consequence of a person's deeds, and that the same cannot be put off by artificial methods. Other than that, it is also in stark contrast with the medical policy and oath undertaken by the medicinal professionals, in full knowledge of the fact that such untimely termination of life should not just be based off moral grounds but physical incapacities as well. It cannot be sidelined that legalization of euthanasia would inherently undermine the importance of people's lives, as they now have a steady solution for the same. For instance, a mentally ill person or a physically disabled person would not want to depend on their family in fear of becoming a burden to them and therefore can take the way out via euthanasia. The reasons appropriated for the penalizing of attempt to suicide in the Indian Penal Code can be attached to euthanasia. Finally, when a person is virtually dead or has been suffering long term, it doesn't go without doubt that the person is destined to the same till the end, but in fact, there can be improvements in the medical world that could possibly negate the suffering of such people.

Correlation between the Legal and Humanitarian Facets

²⁰Dr A. Bhatia, Law Relating to Euthanasia After Aruna Shanbaug's Verdict, *Nyaya Deep* [vol 13, issue 3] July 2012.

²¹L Ganzini, Attitudes of Oregon Psychiatrists Toward PAS, *AM J Psychiatry* [Edn of 1996] p.1469-73
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“The ability of patients to choose how they could die should be respected and revered as a way to maintain control, which can help them in maintaining personal dignity in death.²² The fundamental argument in favor of euthanasia is that a person must have the personal power of attorney and human dignity to enable them to take decisions pertaining to their own life. “The notions of personal autonomy may affect the future development of human jurisprudence around.”²³In addition, usage of artificial means to sustain the life of the patient, and the several sessions and tethering to the medical systems can severely depreciate the quality of life of the said patient, and for the same reason, as a reverence towards a person’s right to live, their right to die must be recognized to enable a humane and willful death as against a painful alternative. The same was recognized by the European Court²⁴, when it stated that laws made so as to deprive a person of their individual right to a dignified death is an ultimate interference with their personal life and liberty.²⁵ Euthanasia remains illegal in several parts of the world. It is a fact undisputed that in a case of legalization of active euthanasia, unchecked, could lead to the victimization of the vulnerable sects of the people, and despite the inherent human right to life a dignified life, the legal aspects come into force, as was elaborated upon in the case of Pretty. Mercy killing in several countries attracts the laws of murder, and at the same time also attracts their right to die a dignified death, as they choose to, granting them the power to maneuver their own life or otherwise. For the same reasons, euthanasia cannot be ideally implemented in most countries, unless headed by an investigative body which ensures that the same is reasonable and justified. Euthanasia is one such topic that attracts arguments on both sides of the legal and humanitarian spectrum.

INFERENCE & CONCLUSION

We believe to confer anything white or black stately here would be a blasphemy in the context of humanity as a whole with a weight more towards the grey spots that have been presented to us through our honest endeavor on researching this topic. However on examining the different arguments and legislations as could be found in different parts of the globe and also to note across different belief’s, faiths, religions that were against the practice and the also the notably change in thought processes of some religion which subsequently have allowed people to

²²Dr Irena Shala, The Debate Over Euthanasia and Human Rights, European Scientific Journal, [March 2016, Vol 12 No 8], page 78

²³Rishworth, The New Zealand Bill of Right [Oxford University Press 2003] fq.220

²⁴BBC - Ethics - Euthanasia: Active And Passive Euthanasia' (*Bbc.co.uk*, 2020)

²⁵Pretty v. United Kingdom and the Universal Right to Die, (2002) 35 Eur HR Rep 1.4

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undertake this procedure, However all in all a very relevant dawn that seems to have been produced is with regard to the situation currently is although through para's and phrases the concept has stayed in the corridors since decades all together it still consists of uncertainty and hence can be conferred to be kept in a more or less stage of infancy.



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