

# Euthanasia Juridic Review in Medical Practice in Indonesia

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**Abstract.** Euthanasia is a deliberate practice to finish somebody's life from pain and suffering. In the Duty profession, doctors sued to keep going strive healing in the patient, on the other hand, disease patient already no could be cured consideration many things could be good euthanasia, active or passive. Arrangements by special against euthanasia in regulation legislation invitation are needed to give protection and energy health for patients. Guidelines and guides in euthanasia are necessary for professional medical operation rights and obligations for giving maximum service to patients. The implementation of euthanasia is necessary to set in law positively in Indonesia.

**Keywords:** euthanasia; legislation

## 1 Introduction

Killing comes from the Greek word, where Eu implies Great and Thanatos implies passing. Killing is a conscious practice to complete somebody's life from torment and suffering.[1] A few nations have applied different Willful extermination regulations. The English Place of Rulers Panel of Clinical Morals deciphers willful extermination which implies " a conscious mediation embraced with the express expectation of finishing a daily existence, to ease recalcitrant misery " or said as "Vital Mediation" to show a craving to end life from extraordinary suffering"[2] while in the Netherlands and Belgium they mean killing as "end" life by a specialist with want from patient".[3] Anyway Dutch regulation not utilizing the words "Willful extermination" however utilizing the words "helped murder and end of existence with want person."

In light of the kind of killing that can be shared There are two sorts of willful extermination, specifically dynamic and latent killing. Dynamic killing is a deed done by clinical through mediation dynamic a specialist with an objective for the end life human. Dynamic killing shares become dynamic willful extermination immediate and dynamic willful extermination backhanded. In dynamic willful extermination, direct power wellbeing. To do a clinical activity by the course that counts will end the existence patient, or abbreviate the existence patient. Dynamic killing not a direct is activity specialist or power wellbeing To really do activity clinical for easing up the experiencing patient, in any case, is realized presence risk activity that could abbreviate or end the existence of the patient.

Passive euthanasia is deed stop or pulling out all action or necessary treatment for maintaining human life. Passive euthanasia occurs if a doctor or powerful health other by on purpose not again give help medical to patients who can support his life. In passive euthanasia, giving therapy palliative must be permanently given.[4] [5]

Indonesia's positive law yet regulates euthanasia explicitly and special, therefore that if occur case of euthanasia then applicable law is still very common or *lex generalis*. Indonesia yet has a law governing the "rights" of the dead". In Invite 1945 Constitution, rights basic regulated by humans only the right basis for the alive, not yet set "rights" basic for the dead." Article 4 of the Law Invite 39 of 1999 concerning Rights basic Man stated: "Rights" for life are honorable fundamental humans who don't could be reduced in a state anything and by anyone," It only set "rights" for life", no regulate about "rights" for die.

Euthanasia in Indonesian Law is still not enough assertive in the settings will but Euthanasia is Active and could sentence to Article 344 of the Criminal Code. Article 344 of the Criminal Code determines the ban for removing other people's souls at the request of the person who asked to end his life. The article mentions: "Goods who rob other people's lives that person's request clear self-declared with seriousness heart, threatened with criminal maximum prison two mercy year" [6] with sound chapter this so should a doctor reject to do action for remove life, even family patient willed."

Based on provision Article 344 of the Criminal Code then could be concluded that murder on the victim's request threatened criminal for the culprit. In context law positive in Indonesia, euthanasia is permanently considered prohibited and not possible to do ending the life of somebody even on that person's request the deed the permanently qualified as an act criminal, that is a threatened action with criminal for who violates the ban.

The MUI Fatwa Commission (Indonesian Ulema Council) Jakarta on July 12, 2001, issued a fatwa on the Euthanasia Law that according to Islamic teachings, the law of Euthanasia is haram because the right to turn on and off man only is in the hands of Allah SWT as it was said in Surah Ali Imran verse 156: "God gives life and causes death. Allah sees what are you doing "Euthanasia" is something action kill that is forbidden by Allah SWT as it was said in An Nisa's letter verse 29: "And do not you kill you, verily Allah is almighty caring to you. Likewise, it is said in Surah Al An'am verse 151: "And do not you kill a soul that Allah has forbidden to kill, but with something the right cause".

According to Chapter III, articles 14 and 15 of the Regulation of the Minister of Health No.37 of 2014 concerning the Determination of Death and Utilization of Donor Organs stated : (14) In sufferers who're withinside the nation, no ought to cure result the disorder he's struggling from (terminal nation) and movements scientific already drain futile carried out termination or postpone remedy assist live. (15) Family patients could ask the doctor for termination or delay therapy help life or ask to evaluate state patient for termination or delay therapy help life.

However, this regulation is only a ministry health regulation. The Ministerial Regulation by juridical could not make doctors or family patients perform euthanasia. In the hierarchy legislation described by Hans Nawisky, Ministerial Health regulations are just an eroding and Autonomie sizing. Where with existing regulation *Lex superior derogate legi inferior* could negate regulation. [7]

In practice medicine, based on the code of ethics medical mentioned: Every doctor must always remember will his obligation to protect life creature human. In part explanation with assertive mentioned that the strong instinct in every animate creature, including man is to maintain his life. Effort for that is the duty of a doctor. Doctors must attempt to maintain the life creature humans, meaning that good according to religion and state laws, as well as According to Medical Ethics, a doctor is not allowed: (A). Abort the womb (abortion provocatus). (B). End life is somebody patient, who according to knowledge and experience, not possible will healed again (euthanasia). [8]

A doctor's task is to help soul a patient, even though when the thing the already no can next again and then continued, sometimes will add suffering a patient. Termination helps the

one form of euthanasia. In KODEKI (Code of Ethics Medicine) chapter 2 explained that; 14 "A doctor must always strive do his profession by standard profession highest".

## **2 Discussion**

### **2.1 Euthanasia Regulations and Legislation in Indonesia**

At the moment, the issue of euthanasia is argued in many countries, especially places that adhere to freedom and apply euthanasia laws. Many countries are still not yet could produce a voice around euthanasia whether it is allowed or not to be done for someone, as well as what happened in Indonesia. In principle right to life is a fundamental right or human right. [9] In the 1945 Constitution, Article 28A of the 1945 Constitution was made to protect the right to life by stating that everyone has the right to live and deserves to maintain life and life. [10]

Principle general Relevant Criminal Law (KUHP) with problem soul man is given protection for rights life by reasonable as dignity humanity guaranteed. Based on the law in Indonesia euthanasia is an action against the law.[11] Indonesia indeed not yet arranged specific and clear regarding euthanasia. Euthanasia or removing an upper person's life request alone as well as a criminal deed of eliminating someone's life. The Euthanasia concept now still Becomes an expert debate. Parties who agree to euthanasia stated: an opinion based on every people having the right to life and the right to end his life quickly by human reason. With the state the one who did not allow for healing or even living again, then he could do the application quickly ended his life. Temporary that part of the party who does not allow reasoned euthanasia that every man no have the right to end his life, because the problem of life and death is the power of God who could not disturb sued by humans. Two views the more make the long debate about may whether or not to perform euthanasia in system law in Indonesia.

In Indonesia, the issue of killing is as yet not yet get perceived by juridical, and conceivable in the advancement of Indonesian Positive Regulation, killing will get perceived place by juridical [9] From the viewpoint right essential basic liberties for life are principal freedoms for each human. The outcome of the right life is the commitment of each and every man to regard the tall superb existence of people. Article 3 Announcement of Common liberty express that everybody has the option to vocation, opportunity, and security somebody. While Regulation no. 39 of 1999 concerning Basic freedoms in Article 9 passage 1 affirms that everybody has the option to live, shield live and work fair and square of his life. Proclamation of ideal for life affirmed in clarification Article 9 passage 1 of Regulation no. 39 of 1999, specifically: "Everybody has the privilege to life, keep up with life, and work on his life." Right on life this even joined to infants who had not been conceived or the sentenced individual dead. In an uncommon circumstance, or at least, for the existences of the mother in the event that early termination or in view of choice Court in the event that criminal pass on, then, at that point, activity fetus removal or criminal dead in the condition that actually could be allowed." [12]

As per the meaning of clinical crime scene investigation, willful extermination is one type of homicide, where someone switches off with importance to end individuals' enduring [13]. The Indonesian sanction and guideline offer a guarantee of complete legitimate ways of life fellow as set withinside the 1945 Constitution and Regulation no. 39 of 1999 with respect

to Common liberties. The legitimate way of life is stated as a legitimate association with each Indonesian resident. [9]

Prof Sutan Remy Sjahdeini in his book "Health Law on Malpractice Law" says that Indonesia has not had a law that regulates "the rights" of the "dead". In the 1945 Constitution, Human Rights organized only "rights" basic for life " not yet " set " rights " basic for dead ". Law No. 39 of 1999 concerning Human Rights neither is arranged regarding " rights " for the dead ", but only set " rights " for life" as " specified in Article 4 of the Law that. He also thinks that besides the 1945 Constitution and Law no. 39 of 1999 concerning Human Rights, no arrangement regarding rights for the dead, also Article 344 of the Criminal Code determines a ban for removing other people's souls on the request of the person who asked ended his life [14] Putranto Santoso noted that euthanasia is a dilemma problem for doctors in Indonesia. In Indonesia, from an aspect criminal, all active forms of euthanasia are prohibited by Article 344 of the Criminal Code.

## 2.2 Euthanasia in Criminal Law

In the Criminal Code, regulations that can relate to euthanasia can be found in Chapter XIX chapter 338 to Article 350 on crime to people's souls. According to the systematics of the Criminal Code, types of crime to soul propped up to element subjective divided over two groups namely: (1) The crime aimed at to soul man done with on purpose or called with dolense misdrijven, in chapters 338 to with Article 350 of the Criminal Code. (2) The crime aimed at to human soul happening because of omission or called with culpense misdrijven, in article 359 of the Criminal Code [15]

View from target-related wrongdoings with entertainment harmed hooligan guideline to soul fellow can be sorted into three organizations to be specific: (1) The wrongdoing pointed toward soul people overall. (2 ) Expected wrongdoing to soul a middle child or right now conceived. (three) The implied wrongdoing to soul a child who's by and by satisfied material with the mother. Wrongdoing to soul man comprises of the best 5 sorts to be specific : (1) Murder with deliberately or doodslag, article 338 of the Lawbreaker Code. (2 ) Planned murder all the more previously or moord, article 340 of the Lawbreaker Code. (3) Murder in shape that can be irritated discipline or gequalificeerde doodslag, Article 339 of the Crook Code. (4 ) Murder perpetrated with an exceptionally firm sollicitation by the person in question, article 344 of the Lawbreaker Code. (5) The activities of an individual with intentionally suggest or help or give power work to others for To really do kill self, article 345 of the Crook Code. [16]

In the Criminal Code, no one found an article that really regulates euthanasia. However if observed so article used to show the ban against euthanasia in Indonesia is Article 344 of the Criminal Code, namely: about a murder committed with a firm request by the victim. Article 344 of the Criminal Code states that: that " stuff " who remove other people's soul above that person's request himself, the one he mentioned with real and with seriously, in law prison forever 12 years." [17] In the formula chapter, this required that a request for a kill must be mentioned with real and earnest (Ernsting) if the condition this not fulfilled so perpetrator will unravel Article 338 of the Criminal Code, namely: the chapter about murder ordinary. Other articles that can relate to euthanasia are articles 304, 306, 340, 345,356, 359, and 531 of the Criminal Code. [16]

Article 304 of the Crook Code peruses [17]" Merchandise " who with deliberately cause or let individuals inside wretchedness, moderate he Expected to give life, care or support on that

individual on the grounds that material regulation on it or on the grounds that as per the arrangement, rebuffed jail always 2 years and 8 months." Article 306 of the Lawbreaker Code peruses " Assuming it brings about death, activity (in article 304 of the Crook Code) is dependent upon criminal jail most extreme 9 years. [17]

The 2 chapters above give an affirmation that in the context of Indonesian positive law, leaving the underprivileged also helps qualify as a criminal. Also, means forbid happening euthanasia frequently passive happened in Indonesia.[16] Besides, Article 345 of the Criminal Code reads [17]" Goods " who with on purpose inciting others to kill yourself, help in deed that or give power effort to him for that, then if that person so kills self, punished prison forever 4 months."

Article 345 of the Criminal Code reminds the power medical not to perform active euthanasia which is something action murder, help, or give power effort toward deed the already get threat criminal. Words help him or give power effort could connect with incident appearance something will or a desire To do euthanasia act. A patient or his family is not enough knowing roads or streets to release themselves from their suffering. Here, the patient and his family experience confusion, then the words of energy medical according to them are a bit of advice for performing euthanasia complete problem they considered as very meaningful advice for the family or patient deed health clearly could be classified in definition help him or give power effort. [18]

Then, Article 359 of the Criminal Code reads " Goods " who because wrong cause the death of the condemned prison forever five years or confinement forever 1 year ". [18] Article 531 of the Criminal Code reads "[17] Goods " who watching alone there's someone inside state danger death, neglect gives or stage help to him currently help that could give it or hold with no will worry, that he alone or someone else will hit danger punished confinement forever 3 months. " [17] The article's existence is to remind everyone to be careful in facing euthanasia cases. Based on Article 345 of the Criminal Code provides hope or help for just euthanasia could wear a threat to criminals, especially if to do an act of euthanasia.

In review law criminal, with reason, anything and anyone who removes other people's lives without rights, except by other parties permitted by law must be considered as a crime as meant in articles 48, 49, 50, and 51 of the Criminal Code. Temporary, all the party who owns attitude direct, whether doing, ordering, or participating, that moving and helping must be considered as a responsible party ( see \_ articles 55 and 56 of the Criminal Code). [16]

Generally, regulation could not deliver the company method approximately Dead so the instant now no longer but have strict limits on euthanasia. The formulation of bankruptcy within the Criminal Code handiest mentions that Dead is the loss of existence of someone. So, officially the regulation is primarily based totally on regulation In Indonesia, the crook act of euthanasia is: a prohibited act carried out by all and sundry inclusive through doctors. [16]

In light of article 344 of the Crook Code, willful extermination juridical is a precluded act in Indonesia. Considering that Indonesia complies with the guideline of legitimacy, time this not yet there are positive boundaries as indicated by regulation connected with willful extermination then required firm equation about the importance of killing regulation so that becomes direction for everybody, particularly specialists and clinical staff when should up close and personal with killing cases.[16]

Those who help to do acts of euthanasia then could be charged with Articles 55, 56, and 57 of the Criminal Code. Article 55 of the Criminal Code reads [17] (1) Sentenced as the one who did criminal incident:1e. The person who does, whom orders, or joins the deed; 2e. People with a gift, agreement, misuse power or influence, violence, threat or trick power or with giving opportunity, power effort or information, on purpose, persuade for To do something deeds. (2)

About those people in sub 2e that is possible accountable to him just actions with on purpose persuaded by them that, as well as with consequently.

In the Euthanasia issue, the doctor or power where is the other health party they do, order to do or join to do in action this so will also be punished as the one who did criminal or also as the wrong person to wear power. Then, Article 56 reads :[17] punished as someone who helps commit a crime: 1. Whoever with on purpose help To do the crime; 2. Whoever with on purpose gives opportunity, power effort, or description for To do crime it. Likewise, Article 57 reads [17]; (1) In Thing assistance, maximum criminal tree to crime, reduced one third, ( 2) If crime threatened with criminal dead or criminal prison lifetime live, dropped criminal imprisonment for a maximum of fifteen years. (3) Criminal addition for help same with the crime alone. ( 4) In determining a criminal for helper, who counts only an intentional act made easy or streamlined by him, along with the consequences.

Sutarno, in his book Health Euthanasia Law, justice and law positive opinion in Indonesia helps the act of euthanasia when euthanasia is considered something crime so it means that aids could be charged with Articles 56 and 57 of the Criminal Code, this could just be carried out by doctors, nurses, and family patient. [18]

### 3 Conclusion

Indonesian Positive Regulation manages killing unequivocally since, supposing that an instance of willful extermination happens, then material regulation is as yet common or lex generalis. The guideline about end of life base previously set in Clergyman of Wellbeing Guideline No. 37 of 2014 with respect to the Assurance of Death and Use of Contributor Organs. Be that as it may, the guideline isn't yet finished and has restricted restricting.

### References

- [1] Kuhse , Helga. "The Case of Active Voluntarily Euthanasia" . Willey-Blackwell. < <https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1748-720X.1986.tb00969.x>>. 1986
- [2] Harris, NM, The Euthanasia debate: Euthanasia and assisted suicide in the Journal of the Royal Army medical corps. JR Army Med Corps,2001, 147(3) :367–70. Doi: 10.1136/jramc-147-03-22
- [3] Carr , Claudia , Unlocking Medical Law and Ethics (2nd ed.). Routledge,2014 Page 374.
- [4] McQuoid-Mason, DJ 2020. Emergency Medical Treatment and 'do not resuscitate orders: When can they be used? In the South African medical journal = Suid-Afrikaanse tydskrif vir geneeskunde 103(4):223-5
- [5] Annadurai, Kalaivani,Euthanasia: Right to die with Dignity. Journal of Family Medicine and Primary care 3(4),2014: 477-8
- [6] Republic of Indonesia. law book law criminal law , Jakarta. Secretary General Assembly of the Republic of Indonesia, 2000
- [7] Indarti , Maria Farida. 2016. Science legislation . Page 3.5 Open University publisher ISBN 9789790019505

- [8] Assembly Honor Ethics Indonesian Medicine (MKEK). 2006. Code of Conduct Indonesian Medicine and Guidelines Implementation code ethics medicine in Indonesia. Publisher Bond Indonesian doctor
- [9] Pradjonggo , Tjandra Sridjaja . 2016. Inject dead (euthanasia) reviewed from aspect law crime and rights basic humans in Indonesia. Wisnuwardhana University Malang.
- [10] Unitary State Republic of Indonesia. 1945 Constitution of the Republic of Indonesia
- [11] J.Guwandi. Hospital law : emerging doctrines & jurisprudence. Jakarta: Balai Publisher FKUI : 2002
- [12] Republic of Indonesia. 1999 . UU no. 39 of 1999. Article 9 paragraph 1 Promulgated in Jakarta on 23 September 1999
- [13] Abdul Mun'im Idries , 1997, Guidelines Knowledge Medical Forensics , Edition First Bina Rupa Aksara , Jakarta
- [14] Sjahdeini , Sutan Remy. 2020. Health law about law malpractice power medical Volume 1 page 217. Publisher : IPB press, Bogor.
- [15] Zubir Haini , 2001, Crime Against the Human Soul , Writing on Islamic Criminal Law in Indonesia Opportunities , Prospects and Challenges , Librarian Firdaus, Prints First , Jakarta,
- [16] Yudaningsih , Lilik Purvastuti . 2015. Overview Juridical Euthanasia views from aspect law Criminal
- [17] Republic of Indonesia. Criminal Code
- [18] Sutarno . 2014. Health Euthanasia Law, justice and law positive in Indonesia. Page 78. Publisher : Press equivalent . Poor.
- [19] Letellier , Phillipe. 2010. History and definition of a word, in Euthanasia: Ethical and Human aspects. Council of Europe. Strasbourg: Council of Europe, 2003. Page 13-24.
- [20] Moulton et al . "Religion and Trends in Euthanasia Attitudes among US Adults, 1977–2004." Sociological Forum 21.2,2006,: page 249-72.
- [21] Wreen , Michael 1988. "The Definition of Euthanasia". Philosophy and Phenomenological Research. 48 (4): pages 637–53 [639]
- [22] Apple, Jacob. 2004. "A Duty to Kill? A Duty to Die? Rethinking the Euthanasia Controversy of 1906". Bulletin of the History of Medicine. 78(3):610–34. doi:10.1353/bhm.2004.0106
- [23] Calabrò RS et al . "The Right to Die in Chronic Disorders of Consciousness: Can We Avoid the Slippery Slope Argument?". Innovations in Clinical Neuroscience,2016,p13 (11–12):
- [24] Etheridge and Gatland E. When and how to discuss “do not resuscitate” decisions with patients. BMJ. 2015;350:h2640 DOI:10.1136/ bmj
- [25] Ezekiel, Emanuel. "The history of euthanasia debates in the United States and Britain". Annals of Internal Medicine,1994, 121 (10): 796. CiteSeerX 10.1.1.732.72
- [26] Letellier , Phillipe, History and definition of a word, in Euthanasia: Ethical and Human aspects. Council of Europe. Strasbourg: Council of Europe, 2010. p. 13-24. NLM ID 101259129
- [27] Meier et al, A national survey of physician-assisted suicide and euthanasia in the United States. New England Journal of Medicine. Apr 23, 1998,338(17):1193-201.
- [28] Michalsen A and Reinhart K .2006. ""Euthanasia": A confusing term, abused under the Nazi regime and misused in present end-of-life debate". Intensive Care Med. 32 (9),2006 :1304–10

- [29] Mystakidou , Kyriaki ; Parpa , Efi ; Tsilika , Eleni; Katsouda , Emanuela ; Vlahos, Lambros, "The Evolution of Euthanasia and Its Perceptions in Greek Culture and Civilization". In *Perspectives in Biology and Medicine*, 2005,48(1): 97–98. doi:10.1353/pbm.2005.0013. PMID 15681882. S2CID 44600176
- [30] Otani, Izumi, "Good Manner of Dying" as a Normative Concept: " Autocide ", "Granny Dumping" and Discussions on Euthanasia/Death with Dignity in Japan". *International Journal of Japanese Society*,2010,19(1): 49–63
- [31] Pappas, Demetra,Recent historical perspectives regarding medical euthanasia and physician assisted suicide". *British Medical Bulletin*,1996,52 (2): 386–87.
- [32] Ramsay, "A king, a doctor, and a convenient death". *British Medical Journal*,2011, 308 (1445): 1445. doi:10.1136/bmj.308.6941.1445
- [33] Rathor et al . Attitudes toward euthanasia and related issues among physicians and patients in a multi-cultural society of Malaysia. *J Family Med Prim Care*, 2014 Jul;3(3):230–7
- [34] Rietjens JA, van der Maas PJ, Onwuteaka-Philipsen BD, van Delden JJ, van der Heide A, "Two Decades of Research on Euthanasia from the Netherlands. What Have We Learned and What Questions Remain?". *J Bioeth Inq*,2009,6(3): 271–283. doi:10.1007/s11673-009-9172-3
- [35] Stolberg, Michael,"Active Euthanasia in Pre -Modern Society , 1500–1800: Learned Debates and Popular Practices". *Social History of Medicine*,2007, 20(2): 206–207
- [36] Walsh D. et al. *Palliative medicine. Euthanasia and Physician Assisted Suicide*. 1st ed., Ch. 22. Canada: Saunders; 2009. P. 110
- [37] Canadian House of Commons. Government Bill (House of Commons) C-14 (42-1) - Royal Assent - An Act to amend the Criminal Code and to make related amendments to other Acts (medical assistance in dying) - Parliament of Canada. Article 241.2
- [38] Ministry of Health of the Republic of Indonesia. Regulation Minister Health no 37 of 2014. About regulation death and use of donor organs. Invited in Minutes of the Republic of Indonesia 2014 number 1023
- [39] Koninklijke Nederlandsche Maatschappij tot bevordering der Geneeskunst. 2012. Guidelines for the Practice of Euthanasia and Physician Assisted Suicide
- [40] Republic of Indonesia. Minister of Health Regulation No. 37 of 2014. Promulgated in the State Gazette of the Republic of Indonesia of 2014 number 1023
- [41] Republic of Indonesia. Regulation Minister of Health of the Republic of Indonesia. Number 290/MENKES/PER/III/ of 2008 concerning Approval action medicine. Established in 2008
- [42] Republic of Indonesia. Law No. 23 of 1992 concerning Health. Promulgated in Jakarta on 17 september 1992
- [43] Republic of Indonesia. Law No. 36 of 2009 concerning Health. Promulgated in the State Gazette of the Republic of Indonesia in 2009
- [44] Republic of Indonesia. Law no. 29 of 2004 concerning Practice Medicine . Promulgated in Jakarta on October 6 , 2004 in republic state sheet Indonesia year 2004 number 116
- [45] Republic of Indonesia. Constitution Republic of Indonesia. Number 44 of 2009 concerning Houses sick
- [46] New South Wales supreme court. 2005. *Royal Alexandra Hospital v Joseph and Ors* [2005] NSWSC 422



- [47] State of Oregon. 1994. "Chapter 127,800–995 The Oregon Death with Dignity Act". Oregon State Legislature
- [48] State of Vermont.2013. "Vermont Act 39 Patient Choice and Control at End of Life". Vermont state Legislature
- [49] State of Washington. "Initiative Measure 1000 "The Washington Death with Dignity Act". Secretary of State of Washington. 2008-01-24.