

TO LIVE OR NOT: EUTHANASIA IN KENYA

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Republic v Stephen Kiprotich Leting & 3 others [2009] eKLR, 34 (eKLR)

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1.0 INTRODUCTION

Euthanasia is the deliberate ending of a terminally patient to relieve suffering. It is performed by the attending physician administering a fatal dose of a suitable drug to the patient on his or her express request.¹ It comes from the Greek words, Eu (good) and Thanatos (death) and it means "Good Death, "Gentle and Easy Death."² Augustus Ceaser was the first person to have a peaceful and easy death at seventy five and therefore Francis Bacon (1561–1626) the first scholar to maintain the fact that the practice of medicine should include knowledge and skill that enable doctors to help patients to die easily and naturally.³ It can be voluntary or non voluntary euthanasia. Voluntary euthanasia is where a person makes a conscious decision to die and asks for help to do so while non-voluntary euthanasia, where a person is unable to give their consent because he/she is in coma or not in that state of mind. In this case another person takes the decision on their behalf, often their loved ones or close people who understand the best interest of the patient.⁴

¹ 'Euthanasia, Human Rights And The Law | Australian Human Rights Commission' (Humanrights.gov.au, 2017) <<https://www.humanrights.gov.au/our-work/age-discrimination/publications/euthanasia-human-rights-and-law>> accessed 22 November 2017.

² 'A General History Of Euthanasia | The Life Resources Charitable Trust' (Life.org.nz, 2017) <<http://www.life.org.nz/euthanasia/abouteuthanasia/history-euthanasia1/>> accessed 22 November 2017.

³ Harold y. Vanderpool, 'Life-Sustaining Treatment And Euthanasia: II. Historical Aspects - Dictionary Definition Of Life-Sustaining Treatment And Euthanasia: II. Historical Aspects | Encyclopedia.Com: FREE Online Dictionary' (Encyclopedia.com, 2017) <<http://www.encyclopedia.com/science/encyclopedias-almanacs-transcripts-and-maps/life-sustaining-treatment-and-euthanasia-ii-historical-aspects>> accessed 22 November 2017.

⁴ Christian Nordqvist, 'Euthanasia And Assisted Suicide' (Medical News Today, 2017) <<https://www.medicalnewstoday.com/articles/182951.php>> accessed 22 November 2017.

There is also Active euthanasia, where the Action is taken to bring a life to an end, e.g. a lethal dose of drugs is given while in Passive euthanasia, a Decision is made to stop giving treatment, even though death will result.⁵

It was legal till the 12th century where the Christian descendants viewed life as priceless and only God could take one's life. It started becoming illegal in many countries. In 2002 Netherlands became the first country to legalize euthanasia, then countries like Belgium and Germany legalized it as well.⁶

In Kenya, however it is still illegal. It is criminalized under section 213(d)⁷, even though we have the right to life in article 26 of the Constitution.⁸

1.1.HISTORICAL BACKGROUND

1.1.1. History of euthanasia

Euthanasia was legal in the 5th century in ancient Greece and Rome. After the coming of Christianity, attitudes towards, active euthanasia had tended not to be tolerant because the Greeks and Romans viewed as life as an ordinary gift and not inherent.⁹

In the 12th to 15th century the ascendancy of Christianity viewed euthanasia as degrading. The Christians were of the view that human life is a trust from God and should not be terminated by any other person except God.¹⁰

In the thirteenth century, Thomas Aquinas, following the Catholic views, saw life as a gift from God. He opposed euthanasia because it contravened one's duty to oneself and injured

⁵ James Fieser, 'Cite A Website - Cite This For Me' (Utm.edu, 2017)
<<https://www.utm.edu/staff/jfieser/class/160/6-euthanasia.htm>> accessed 23 November 2017.

⁶ Euthanasia And Assisted Suicide Laws Around The World' (the Guardian, 2014)
<<https://www.theguardian.com/society/2014/jul/17/euthanasia-assisted-suicide-laws-world>> accessed 23 November 2017.

⁷ Penal Code, 1930

⁸ Constitution of Kenya, 2010

⁹ 'Historical Timeline - Euthanasia - Procon.Org' (Euthanasia.procon.org, 2013)
<<https://euthanasia.procon.org/view.timeline.php?timelineID=000022>> accessed 23 November 2017.

¹⁰ Ibid (n 9)

other people and the community of which the individual is a part. It violates God's authority over life, which is God's gift.¹¹

1.1.2 History of euthanasia in Kenya

In Kenya, before the colonialists came, the Kenyans had different beliefs in God. The name given to God changes from people to people depending on their cultures. Some examples are *Ngai, Enkai, Akuj, Mulungu and Mungu*.¹² They believed that resides in the sky or on high mountains and is associated with rain and other weather seasons. They would therefore worship the sun, mountains and so on.¹³

In 1592, the Portuguese came and established Fort Jesus to spread Christianity. In 1597 there were 600 African converts, including slaves, Swahilis and Bantu people. There were also priests stationed on the islands of Lamu, Pate and Faza. This is where the colonial era begun. Then the British came to colonize Kenya. In 1840 Johann Ludwig Krapf and Johannes Rebmann, travelled between Mombasa and Uganda, spreading Christianity. Churches were founded in the 1920s and 1930s, especially in areas where Kikuyu, Luo, and Luhya predominated. not all of the churches were controlled by the government, some were formed independently to show that these tribes are prescribing to Christianity.

When the Lancaster House in 1960 was discussed, the British set a rule that Christianity to be practiced in Kenya. By then 40% of the Kenyans had changed their fate.

Now, approximately 70% of Kenyans are Christians (38% Protestant, 28% Catholic).

This spread in Christianity has also brought the view that life can not only be ended by God and therefore euthanasia has not been legalized in Kenya.

¹¹ Ibid (n 9)

¹² Jens Finke, 'Kenyan Religions And Beliefs - Traditional Music & Cultures Of Kenya' (Bluegecko.org, 2017) <<http://www.bluegecko.org/kenya/contexts/kenyabeliefs.htm>> accessed 24 November 2017.

¹³ Ibid (n 12)

1.1.3 Link between Christianity and Euthanasia.

As seen before, Christianity is the one of the factors that influenced Euthanasia. Since in Kenya, the spread of Christianity was vast (70%), euthanasia was banned in Kenya.

1.2. PROBLEM STATEMENT

Euthanasia as described above is illegal in Kenya. In Kenya the Constitution gives the right to life in article 26, which should not be deprived.¹⁴ However, I feel there is a misunderstanding on the way the right to life has been interpreted, especially in Kenya. Article 26 shows there is a lacunae in the law.

As per Sunil Batra v. Delhi Administration “‘Life’ in was interpreted as, not merely the physical act of breathing. It does not connote mere animal existence or continued drudgery through life. It has a much wider meaning which includes right to live with human dignity, right to livelihood, right to health... the right to health is defined as enjoying all faculties of the human body in their prime conditions.”¹⁵

1.3. RESEARCH QUESTIONS

Why do most people perceive euthanasia as a wrong practice?

What is the nexus between euthanasia and the right to life?

Why is euthanasia illegal in Kenya when in countries like Netherlands, euthanasia is legal?

If utilitarianism supports the fact that there should be more pleasure and less suffering, then why are we refused to administer a lethal injection to decrease our pain?

1.4. HYPOTHESIS

Religion is one of the factors that has made euthanasia illegal. When in the 12th and 13th

¹⁴ Constitution of Kenya, 2010.

¹⁵ Sunil Batra v. Delhi Administration, AIR 1980 SC 1579: (1980) 3 SCC 488.

Century euthanasia was banned, it was believed that life is God's gift and only He has a right to take someone's life.

This influence is shown in Kenya. Even though article 8 states that Kenya is a secular state, the Preamble of the Constitution mentions God.¹⁶ Also, during swearing, God is mentioned. Since most people subscribe to a religion, especially Christianity, the belief of death only being a natural one, makes euthanasia illegal.

Another assumption is that the State owns our lives. The Constitution, article 26(3) only permits intentional deprivation of life if it is allowed by the Constitution or any written other law.¹⁷ This contradicts with article 26(1). In the case, *State of Maharashtra v. Maruti Sripati Dubal*, the Bombay High Court held that the right to life also means the right to choose when to die, but it is only limited to a dying person who is seriously ill. Therefore, it is not justifiable that the state chooses when a person dies, which is either through natural death or by death penalty.¹⁸

1.5. THEORETICAL FRAMEWORK

1.5.1 Utilitarianism

Utilitarianism is an ethical philosophy in which the happiness of the greatest number of people in the society is considered the greatest good.¹⁹ It is a theory introduced by Jeremy Bentham and John Stuart Mill.

1.5.2 Bentham and Mill

For Bentham, actions that gave greater pleasure to a larger number of society was the best for everyone and the one which gave the greatest pain to a larger majority was classified as a bad action. Bentham's Principle of Utility: (1) Recognizes the fundamental role of pain and

¹⁶ 2010

¹⁷ Constitution of Kenya, 2010

¹⁸ *State of Maharashtra v Maruti Sripati Dubal* [2017] SC, 1996-8-116 (SC).

¹⁹ L. B Curzon, *Jurisprudence* (Cavendish 2005).

pleasure in human life, (2) approves or disapproves of an action on the basis of the amount of pain or pleasure brought about i.e., consequences, (3) equates good with pleasure and evil with pain, and (4) asserts that pleasure and pain are capable of quantification (and hence 'measure')²⁰

Mill on the other hand believes that pleasure and pain cannot be quantified as the calculus is unreasonable. Utilitarianism refers to "the Greatest Happiness Principle" -- it seeks to promote the capability of achieving happiness (higher pleasures) for the most amount of people (this is its "extent").²¹

1.5.3 Criticism

Utilitarianism is alleged to be faulty in the way it requires us to think about all kinds of actions.²² This means that we have to think about the greater good of people and sometimes it is not possible to think about everything that comes our way because there are unthinkable scenarios where you have to act fast. For example, if a boy is being beaten by the mother, there shall be no time to think why he is being beaten and is it justifiable. The first instinct shall be to stop the mother.

Another criticism is the fact that happiness cannot be quantified.²³ It is hard to understand what is a greater good for a person. It also becomes a subjective matter because one thing that may be good for one may not be good for the other. It then becomes controversial such that the weight of the greater shall be "measured" according to one's needs.

²⁰ 'Online Guide To Ethics And Moral Philosophy' (*Caee.phil.cmu.edu*, 2017) <<http://caee.phil.cmu.edu/cavalier/80130/part1/sect4/BenandMill.html>> accessed 25 November 2017.

²¹ 'Mill, John Stuart: Ethics | Internet Encyclopedia Of Philosophy' (*Iep.utm.edu*, 2017) <<http://www.iep.utm.edu/mill-eth/>> accessed 25 November 2017.

²² 'Common Criticisms Of Utilitarianism' (*Utilitarian.org*, 2017) <<https://www.utilitarian.org/criticisms.html>> accessed 26 November 2017.

²³ *Ibid* (n22)

Lastly, utilitarianism focuses on the greater good of the people²⁴. This can only be possible if people are not selfish. There shall be instances when a person shall look at their happiness as compared to others and this may not be the greater good for the society.

1.5.4 My view

Since utilitarianism looks at the greater good of the people, it is a theory that supports euthanasia. Euthanasia is a way to bring good to the people for both the patients and the family members. However, it assume that euthanizing is the best option and for the greater good while perhaps if a person can survive from their illness then it shall be a loss. Like utilitarianism, pain can not be quantified, therefore both euthanasia and utilitarianism are on based on assumptions.

1.6. LITERATURE REVIEW

James Fieser in his article, '*From Moral Issues that Divide Us,*' says that since euthanasia is illegal, patients suffering from cancer in the spine and lungs ask their doctors or loved ones to euthanize them, they are denied that right because of the fear of being imprisoned.²⁵ It does not seem justifiable that a person who is ready to take his life is being denied that right because of fear. The law is there to make our lives in order and only instill fear when there is wrong doing. In this case there is nothing wrong and so there should be no punishment.

In another article, '*Why are we so scared of euthanasia?*' by Andrew Denton. The writer is annoyed that there are no laws governing euthanasia and it is still being practiced.²⁶ It would be better off if there were laws that would legalize it.

²⁴ Sparknotes: Utilitarianism: Chapter 2: What Utilitarianism Is (Part 2)' (Sparknotes.com, 2017)
<<http://www.sparknotes.com/philosophy/utilitarianism/section3.rhtml>> accessed 26 November 2017.

²⁵ James Fieser, 'Euthanasia' [2017] From Moral Issues that Divide Us
<<https://www.utm.edu/staff/jfieser/class/160/6-euthanasia.htm>> accessed 25 November 2017.

²⁶ Andrew Denton, 'Why Are We So Scared Of Euthanasia?' (The Sydney Morning Herald, 2017)
<<http://www.smh.com.au/comment/why-are-we-so-scared-of-euthanasia-20160221-gmzw1k.html>> accessed 25 November 2017.

In the article, *'Dying a good death: what we need from drugs that are meant to end life'*,
Metrine Jepchirchir Kurutto and Michael Wabomba Masinde

say that the drugs used to administer euthanasia can cause seizures and prolonged diseases, but in the long term it is less painful than living a life on life support.²⁷

Moreover, in the article, *'Dying in dignity: The place of euthanasia in Kenya's legal system'*, the writer says that there are people who believe that only God has the right to take one's life but others believe that if the quality of life falls drastically, then people should be given the right to die.²⁸

The question of who owns our life is seen in the article, by Rachel Mbugua: *'Kenya: Is Mercy Killing Acceptable?'*, where the writer points out that euthanasia is a way of exploiting the vulnerable and it is a western concept not acceptable in Kenya.²⁹

All the writers have talked about euthanasia not being acceptable in many countries because of the fear of punishment. They have also said that it should be accepted and to be only used on terminally ill patients. The writers have not given the nexus between the right to life and euthanasia. They do not say that the right to life has been misinterpreted and it should be given a wider scope. They have also not said that the right to life should also extend to the right to die. From the Kenyan context, writers like Rachel Mbugua have not pin pointed out that article 26 is a lacunae in the law and needs to be revised.

1.7 RESEARCH METHODOLOGY

The data from this paper shall be from primary and secondary research. I shall refer to books, journals and articles.

²⁷ Dying A Good Death: What We Need From Drugs That Are Meant To End Life' (The Conversation, 2017) <<https://theconversation.com/dying-a-good-death-what-we-need-from-drugs-that-are-meant-to-end-life-85445>> accessed 25 November 2017.

²⁸ Metrine Jepchirchir Kurutto and Michael Wabomba Masinde, 'Dying In Dignity: The Place Of Euthanasia In Kenya's Legal System' (2017).

²⁹ Rachel Mbugua, 'All Africa' (2004) <<http://allafrica.com/stories/200412061126.html>> accessed 25 November 2017

My secondary sources shall be online journals, case law from Kenya and other jurisdictions, the constitution, statutes, international law.

My methods of research shall be:-

- i. Doctrinal research, which is based on legal analysis
- ii. Comparative legal research- where I shall be comparing different jurisdictions with Kenya, article 2(6)³⁰ giving the backbone.
- iii. Quantitative- where I shall use statistics to show the number of people in Kenya suffering from terminally diseases.
- iv. Legal research- since this a legal paper, legal analysis shall be needed.

1.8.JUSTIFICATION OF THE STUDY

It is to educate my readers and make them understand that the right to life does not mean, only living but it also means the right to die with dignity and the State can not choose when one should die.

My readers should also understand that euthanasia is not to be used in a way to encourage suicide, but it should be used when a patients are suffering from terminal diseases and they have minimal chances of survival.

My readers should understand that preserving human dignity also accounts to dying with dignity and therefore there should be minimum pain and suffering in life.

1.9.CONCLUSION

Euthanasia is a very controversial topic but it can be understood if there is a paraphrase of the word 'life'. Many people are confused because they think life is all about living. If this perspective is changed then perhaps more people will opt for euthanasia. It is not to say that euthanasia has to be used for the wrong reasons, it is only for those that desperately need it

³⁰ Constitution of Kenya, 2010

like the patients in coma. Euthanasia is not an new concept and it has been used before. In the early centuries there were no efficient medical services and therefore, being euthanized was more painful, but people still practiced it. Nowadays, the medicine field has really improved. It is easier to practice euthanasia. This is not to say that people are not being cured by the improvement in the medical field, but there are still patients that are in coma for years and they are suffering.

Euthanasia shall only be administered by medical practitioners and for the right reasons.

1.10 CHAPTER BREAKDOWN

This paper shall start with an introduction of what euthanasia is, how it came to be played and what is its position in Kenya. Then the next topic is the historical background. At first I shall talk about the history of euthanasia, then I shall incorporate the Christian position in Kenya and how it caused the banning of euthanasia. Then I shall talk about hypothesis i.e. the reasons why I think euthanasia is banned in Kenya. I shall talk about the theoretical framework, literature review, justification of the study and lastly the conclusion.

1. 11. REFERENCES AND BIBLIOGRAPHY

1.11.1 Legislation

Constitution of Kenya,2010.

Indian Constitution, 1950

Penal Code 1930.

Universal Declaration of Human Rights, 1948.

1.11.2 Cases

Friends of Lake Turkana Trust v Attorney General & 2 others [2014]eKLR, 825/14 (ELC)

Republic v Stephen Kiprotich Leting & 3 others [2009] eKLR, 34 (eKLR)

Kiluwa Limited & another v Commissioner of Lands & 3 others [2012] eKLR, 8/2015
(HCK)

Cruzan v. Director, Missouri Department of Health

State of Maharashtra v Maruti Sripati Dubal [2017] SC, 1996-8-116 (SC).

1.11.3 Books

Lavi S, *Modern Art Of Dying* (Princeton University Press 2009)

Dowbiggin I, *A Merciful End* (Oxford University Press 2003)

Snyder C, *Euthanasia* (Greenhaven Press 2006)

Walker R, *A Right To Die?* (Watts 2000)

Curzon L, *Jurisprudence* (Cavendish 2005)

Biggs H, *Euthanasia, Death With Dignity, And The Law* (Hart Publ 2001)

Miller H and Edelstein L, 'The Hippocratic Oath. Text, Translation And Interpretation' (1944)
38 The Classical Weekly

Fraser S, 'Death - Whose Decision? Euthanasia And The Terminally Ill' (2017)

Nunes R and Rego G, 'Euthanasia: A Challenge To Medical Ethics' (2017)

Ashcroft R, Principles Of Health Care Ethics (John Wiley & Sons 2007)

Robertson J, 'Involuntary Euthanasia Of Defective Newborns: A Legal Analysis' (1975) 27
Stanford Law Review

1.11.4 Websites

'Euthanasia, Human Rights And The Law | Australian Human Rights Commission'
(*Humanrights.gov.au*, 2017) <<https://www.humanrights.gov.au/our-work/age-discrimination/publications/euthanasia-human-rights-and-law>> accessed 22 November 2017.

'A General History Of Euthanasia | The Life Resources Charitable Trust' (*Life.org.nz*, 2017)
<<http://www.life.org.nz/euthanasia/abouteuthanasia/history-euthanasia1/>> accessed 22
November 2017.

Vanderpool H, 'Life-Sustaining Treatment And Euthanasia: II. Historical Aspects -
Dictionary Definition Of Life-Sustaining Treatment And Euthanasia: II. Historical Aspects |
Encyclopedia.Com: FREE Online Dictionary' (*Encyclopedia.com*, 2017)

<<http://www.encyclopedia.com/science/encyclopedias-almanacs-transcripts-and-maps/life-sustaining-treatment-and-euthanasia-ii-historical-aspects>> accessed 25 November 2017.

Nordqvist C, 'Euthanasia And Assisted Suicide' (Medical News Today, 2017)

<<https://www.medicalnewstoday.com/articles/182951.php>> accessed 22 November 2017

Fieser J, 'Cite A Website - Cite This For Me' (Utm.edu, 2017)

<<https://www.utm.edu/staff/jfieser/class/160/6-euthanasia.htm>> accessed 23 November 2017.

Euthanasia And Assisted Suicide Laws Around The World' (the Guardian, 2014)

<<https://www.theguardian.com/society/2014/jul/17/euthanasia-assisted-suicide-laws-world>>
accessed 23 November 2017.

'Historical Timeline - Euthanasia - Procon.Org' (Euthanasia.procon.org, 2013)

<<https://euthanasia.procon.org/view.timeline.php?timelineID=000022>> accessed 26
November 2017.

Finke J, 'Kenyan Religions And Beliefs - Traditional Music & Cultures Of Kenya'

(Bluegecko.org, 2017) <<http://www.bluegecko.org/kenya/contexts/kenyabeliefs.htm>>
accessed 24 November 2017

'Online Guide To Ethics And Moral Philosophy' (*Caae.phil.cmu.edu*, 2017)

<<http://caae.phil.cmu.edu/cavalier/80130/part1/sect4/BenandMill.html>> accessed 25
November 2017.

'Mill, John Stuart: Ethics | Internet Encyclopedia Of Philosophy' (Iep.utm.edu, 2017)

<<http://www.iep.utm.edu/mill-eth/>> accessed 25 November 2017.

Common Criticisms Of Utilitarianism' (Utilitarian.org, 2017)
<<https://www.utilitarian.org/criticisms.html>> accessed 26 November 2017.

'Neil Gorsuch Wrote The Book On Assisted Suicide. Here's What He Said.' (Washington Post, 2017) <https://www.washingtonpost.com/news/morning-mix/wp/2017/02/01/neil-gorsuch-wrote-the-book-on-assisted-suicide-heres-what-he-said/?utm_term=.b6096a0a86a1> accessed 7 October 2017.

'10 Countries Where Euthanasia And Assisted Suicide Are Legal' (TheRichest, 2017)
<<http://www.therichest.com/rich-list/most-influential/10-countries-where-euthanasia-and-assisted-suicide-are-legal/>> accessed 7 October 2017.

'8 Most Controversial Cases Of Euthanasia - Oddee' (Oddee, 2017)
<https://www.oddee.com/item_99258.aspx> accessed 7 October 2017.

'Historical Timeline - Euthanasia - Procon.Org' (Euthanasia.procon.org, 2017)
<<https://euthanasia.procon.org/view.timeline.php?timelineID=000022#2000-present>> accessed 7 October 2017.

Fieser J, 'Cite A Website - Cite This For Me' (Utm.edu, 2017)
<<https://www.utm.edu/staff/jfieser/class/160/6-euthanasia.htm>> accessed 7 October 2017.

Fleck S, 'The Right To Die' (Susanfleck.com, 2017)

<http://www.susanfleck.com/Philosophy/RS110euthanasia_w2w.htm> accessed 7 October 2017.

'A General History Of Euthanasia | The Life Resources Charitable Trust' (Life.org.nz, 2017)

<<http://www.life.org.nz/euthanasia/abouteuthanasia/history-euthanasia1/>> accessed 7 October 2017.

Masinde M and Kurutto M, 'Dying In Dignity: The Place Of Euthanasia In Kenya's Legal System' (*DeepDyve*, 2017) <<https://www.deepdyve.com/lp/inderscience-publishers/dying-in-dignity-the-place-of-euthanasia-in-kenya-s-legal-system-KpAmVDHYkt>> accessed 7

October 2017.

Mbugua R, 'Kenya: Is Mercy Killing Acceptable' (2017)

<<http://allafrica.com/stories/200412061126.html>> accessed 7 October 2017.

'BBC - Ethics: Euthanasia And Physician Assisted Suicide' (Bbc.co.uk, 2017)

<<http://www.bbc.co.uk/ethics/euthanasia/>> accessed 7 October 2017.

'Mercatornet: Legalising Euthanasia Will Have Incalculable Consequences For Doctors And Nurses.' (MercatorNet, 2017)

<https://www.mercatornet.com/articles/view/would_euthanasia_damage_doctors/6093> accessed 7 October 2017.

'Euthanasia And Assisted Suicide' (Medical News Today, 2017)

<<https://www.medicalnewstoday.com/articles/182951.php>> accessed 8 October 2017.

The Board of Social Responsibility of The Church of Scotland, *Euthanasia: A Christian Perspective* (3rd edn, Church and Society Council 2008)

<http://www.churchofscotland.org.uk/__data/assets/pdf_file/0008/3878/euthanasia_book.pdf>
> accessed 08 October 2017.

Plese M, *Catholic Book Summaries* (1st edn, Lulucom, 2013 2013)

<<https://books.google.lk/books?id=NclpBQAAQBAJ&pg=PA231&dq=pressures+to+end+life+by+euthanasia&hl=en&sa=X&ei=Ymm8VIuvE4z18QWD8IKYCW&ved=0CCAQ6AEwAQ#v=onepage&q=pressures%20to%20end%20life%20by%20euthanasia&f=false>>
accessed 08 October 2017.

Beesley G, *Buddhism: Abortion, Suicide & Euthanasia* (1st edn, 2015)

<http://www.walkden.uk.com/files/7513/1712/7708/Abortion_Suicide_and_Euthanasia.pdf>
accessed 08 October 2017.

'Currently In Victoria - Dying With Dignity Victoria' (*Dwdv.org.au*, 2017)

<<https://www.dwdv.org.au/takeaction/advocacy/currently-in-victoria>> accessed 08 October 2017.

'We Have A Right To Die With Dignity. The Medical Profession Has A Duty To Assist' (*The Conversation*, 2017) <<https://theconversation.com/we-have-a-right-to-die-with-dignity-the-medical-profession-has-a-duty-to-assist-67574>> accessed 8 October 2017.

'Euthanasia In 2015 | Center On Human Exceptionalism' (Discovery.org, 2017)

<<http://www.discovery.org/a/25241>> accessed 8 October 2017.

Terry Pratchett: My Case For A Euthanasia Tribunal' (the Guardian, 2017)

<<https://www.theguardian.com/society/2010/feb/02/terry-pratchett-assisted-suicide-tribunal>>
accessed 7 October 2017.

The Future Of Assisted Suicide And Euthanasia' (Princeton University Press, 2017)

<<https://press.princeton.edu/titles/8317.html>> accessed 8 October 2017.

Aviv R, 'Who Has The Right To Die?' (The New Yorker, 2017)

<<https://www.newyorker.com/magazine/2015/06/22/the-death-treatment>> accessed 8
October 2017.

'Euthanasia – Freedom Writers – Medium' (Medium, 2017) <<https://medium.com/freedom-writers/euthanasia-ea13df3f43b8>> accessed 7 October 2017.

Gee C, 'Terry Pratchett: Choosing To Die, BBC Two, Review' (Telegraph.co.uk, 2017)

<<http://www.telegraph.co.uk/culture/tvandradio/8573428/Terry-Pratchett-Choosing-to-Die-BBC-Two-review.html>> accessed 8 October 2017.

Smith W, 'Opposing Viewpoints In Context - Document' (Ic.galegroup.com, 2017)

<<http://ic.galegroup.com/ic/ovic/ViewpointsDetailsPage/ViewpointsDetailsWindow?displayGroupName=Viewpoints&zid=cdb4c6978b9ef3162ccf8c1beb77d02d&action=2&catId=&documentId=GALE%7CEJ3010375207&userGroupName=west34111&jsid=68f8382f241c0fcc40efbd54b08c94c8>> accessed 8 October 2017.

Euthanasia » Wisconsin Right To Life' (Wrtl.org, 2017) <<http://wrtl.org/assisted-suicide/euthanasia/>> accessed 8 October 2017.

Death With Dignity In Wisconsin' (www.nolo.com, 2017) <<https://www.nolo.com/legal-encyclopedia/wisconsins-compassionate-choices-act.html>> accessed 8 October 2017.

Stein J, 'Teen Urges Wisconsin Lawmakers To Back Right-To-Try Bill After Death Of Mother' (Milwaukee Journal Sentinel, 2017)
<<http://www.jsonline.com/story/news/politics/2017/02/22/wisconsin-lawmakers-consider-right--try-bill-terminally-ill-patients/98247758/>> accessed 8 October 2017.

'Inside Track: Right-To-Try And Right-To-Die: Moving Toward Patient Empowerment:' (WisBar, 2017)
<<http://www.wisbar.org/NewsPublications/InsideTrack/Pages/Article.aspx?Volume=7&Issue=23&ArticleID=24474>> accessed 8 October 2017.