

Right to life Includes ‘Right to Die’ an Assessment in Indian Perspective

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Abstract

Proper to life is the most crucial human right for human survival the Article of 21 of the Indian Constitution assured right to existence. Its significance has been emphasized within the UDHR. Judiciary in their pronouncement saturated in lots of cases filed in US, the case in *Munn v. Illinois* of the Supreme Court observed that the term ‘life’ means something extra than an insignificant animal life styles. The identical changed into assisted by way of Supreme Court of India inside the case *KharakSingh v. State of Uttar Pradesh*. This embodiment of felony entitlement was in addition precise in *Sunil Batra v. Delhi Administration*, wherein the ultimate court had held that the “right to life” blanketed the ‘right to lead a healthy life’ in an effort to experience all faculties of the human body in their high situations.

It’s far then that the question of whether or not the right to die can be given the equal sanctity because the proper to life means of the constitution and whether Article 21 may be interpreted to include the right to die.

A landmark ruling by using the Bombay high court docket spread out a Pandora container of sorts whilst it pronounced the judgement in *State Maharashtra v. Maruty Sripati Dubal* wherein it had declared that the right to life included the proper to die and negated the punitive enchantment of section 309 of the Indian Penal Code 1860 and deemed it to be unconstitutional. This turned into soon overruled with the aid of the Supreme Court in *Gian Kaur v. State of Punjab*, wherein the Hon’ble Apex Court had held that the ‘right life’ does now not include the ‘right to die’ or ‘proper to be killed’.

The ultimate court had time and again played down any attempts in any respect whilst it got here to the question of interpreting proper to die under Article 21 and giving it the fame of a fundamental right. Because the societal outlook modified and because of the increase in case of *Aruna Ramachandra Shanbaug v. Union of India and Ors* recognized passive Euthanasia however had stopped short of asserting it because the right to die and referred the matter to a bigger bench for deciding on a extensive question of regulation.

On 09th Mach 2018, the Supreme Court had delivered a historic judgement in *Common Cause v. UOI* wherein it had laid down problematic

Approaches for the management of passive euthanasia and legalized in part the idea of right to die.

All the aforetasted leads to the query as to how a person ought to live as a human being by using forfeiting his right to dignity in mordant cases wherein he might be restricted as a patient for years together will all hopes misplaced. Therein arises the perplexity of addressing what’s the right to die, when a character can avail the right to die and whether or not right to die can follow even to cases of energetic Euthanasia most importantly whether or not it may be termed as an essential right and examine as an interpretation of right to life.

Key words: Human rights, Administration, Indian Constitution, Right to Die.

INTRODUCTION

Right to life is the most essential and natural right. Constitution of India announces in Article 21, ¹“No character shall be disadvantaged of his life or system established by law.” The right to die and the right to live are aspects of one coin. The right to existence is a basic natural right of the people. It miles a fundamental right of the people. Fundamental right assured under Article 21 clause 3 states ‘no person will be deprived of his life or private liberty anticipate consistent with technique set up by regulation.’

The right to die said in Article 21 of the Constitution of India announces has been liberally interpreted by the Supreme Court of India with a purpose to include inside its purview several new right which includes the right to stay with human dignity, right to livelihood, right to refuge, right to privacy, right to food, right to education, right to get air and water and a few different right these all right very a great deal critical for all people. Above noted all rights widely wide-spread assertion of human right additionally proclamation within the year 1948. The right to life is enshrined in Article 3 of UDHR² in all likelihood every individual has the inherent right to lie? This right shall be protected by law. Nobody will be arbitrarily deprived of his life.

The idea of right to die is primarily based at the opinion that a person is entitled to give up their personal existence or to undergo voluntary euthanasia. Possession of this right is often apprehend to intend that someone with terminal contamination. Legal will say right to die approach the right of a terminally unwell man or woman to refuse to have her or his life prolonged through how can approach synthetic? Or heroic approach and regularly known as passive euthanasia, the withdrawal of feeding tubes and other artificial method of life to an terminally sick ill person.

The meaning of the phrases non-public liberty came up for consideration of the Supreme Court for the first time in *A.K Gopalan v. Union of India*.³ The scope of Article 21 was a bit slim at that time. In this example the best court docket held that word deprivation changed into construed in a slender feel and it became held that the deprivation does no longer restriction upon the right to move freely which got here below Article 19 (1) (d), subsequently in *Maneka Gandhi V. Union of India*,⁴ the ideally suited Court has overruled Gopalan’s case widens the scope of the phrase private liberty.

Right to existence under Article 21 does now not consist of right to die. Right to life is a natural right. The query concerning right to die first time comes before Bombay high court in state of *Maharashtra v. Maruty Dubal*.⁵ Under jurisdiction of living global the right to existence is seemed as maximum outstanding right among all of the fundamental rights. India isn’t always exception to it beneath the ⁶Indian Constitution right to life is regarded as most vital fundamental proper that no derogation from it is approved even in the time whilst the country is suffering from emergency. It is similarly genuine that however essential the right to life can be it is the dying which is the end of the manner. One cannot ignore this fat. Therefore, the query arises that ‘Does the proper to existence encompass the right to die’? If the loss of life is a fundamental a part of existence, must the person’s selection to die, its time and manner?

¹ The Constitution of India, as on 9th November 2015, published Government of India of Law and Justice (legislative department) pp. 10.

²Universal Declaration of Human Right, illustrations by Yacine Ait Kaci, 2015 United Nations pp. 8

³AIR 1950 S.C 27.

⁴ AIR 1978. 597, SCR (2) 621.

⁵1987 Cri L J 743.

⁶Pyali Chatteriee, “Right to life dignity also includes right to die with dignity: time to amend Article 21 of Indian Constitution and Law of euthanasia, 2015-IJSRST, Volume 1, ISSN 2395-6011.

In *Munn v. Illion*⁷ case the Supreme Court of United States Country had observed that the term ‘existence’ means something greater than mere animal life. State or federal has given to it. The availability, it’s far to be located locations property under the same protection as life and liberty. Besides by due process of law, no state can deprive any character of either. The supply has been presupposed to relaxed to every person the vital situations for the pursuit of happiness and for this reason has not been heretofore and should never be construed in any slim or constrained feel, ⁸“No state shall deprive any of life, liberty or belonging without due technique of law”, says the fourteenth modification to the constitution. Through the term ‘life’ as here use, something more is meant than mere animal life. ⁹The inhibition on opposition to its disadvantaged extends to all the one’s limbs schools by way of which life is enjoyed of an arm or leg or the setting out of an eye, or the destruction of some other organ of the body through which the soul communicates with the outer world. The deprivation and enjoyment, is against the law through the supply in question, if its efficacy be now not frittered away by using judicial.

DOES THE RIGHT TO LIFE ENCOMPASS THE RIGHT TO DIE?

Absolutely everyone shall have the right to die with dignity, this right shall consist of the right to select the time of one’s loss of life and to receive medical and pharmaceutical assistance to die painlessly. No health practitioner, nurse or pharmacist shall be held criminally or answerable for assisting a person within the unfastened exercise of this right¹⁰. Many patients on respirators aren’t conscious and so cannot say whether they need to stay or die. But Pier Giorgio Welly remains complete of words, tough and touching ones that can be converting the way Italy thinker about euthanasia and other preference for the ill to give to give up their personal lives¹¹. Nearly all of us could agree that life is the maximum precious present that humans had been given.

Just the threat to be alive in this earth and play a component inside the grand scheme of god’s everlasting plan is a privilege indeed. Yet despite this, there are whilst are time existence turns into so difficult or insufferable that many have, at one time or some other needed they were dead or had in no way been born. For a few, those emotions linger and-in the event that they linger long sufficient, suicide seems to be the best get away. Below jurisdiction of residing world, the right to existence is seemed as maximum outstanding right to life is seemed as maximum outstanding right Ammon all the basic rights. India isn’t always exception ton it. Beneath the Indian Constitution right to life is seemed as maximum critical essential right that no derogation from it is permitted even in the time while the use of a stricken by emergency¹². Its miles similarly authentic that howsoever critical the right to life may be it is death which is the cease of the process. One cannot forget about this reality. The query arises that does the right life include the right to die? Its time and way, be covered from state intrusion? This query nonetheless unsettled despite a long term debate and discussion on this problem, going on at the judicial and further judicial assessment regime.

The Law Commission of India reports¹³ have additionally paid interest taking into consideration the country wide and worldwide legal guidelines and practices and taken into consideration, the growing demand of the society haven given their advice in this problem. In its Law commission of India is in favor of permitting right to die or passive euthanasia in

⁷ 94 U.S 113 (1876).

⁸Cornell Journal Pf Law & Public Policy, Elizabeth Patterson: Civil Contempt and the Indigent Child Contempt and the Indigent Child Support Obligor: the silent Return of Debtor’s prison.

⁹Legal Information Institute (LII) open access to Law since 1992.

¹⁰<http://lawlex.org>>Lex Bulletin

¹¹ New York Times (December 20 2006).

¹² Part XVII of Indian Constitution (Art.352-360).

¹³ 196 Law Commission Report

a constrained number of instances under the stern supervision of panel of professionals with a nicely hooked up technique.

The problem of right to die first got here before a choose bench of splendid Supreme Court of India within the case of *P.Rathinam v. Union of India*¹⁴. In this example, section 309 IPC which penalize try to suicide was held to be unconstitutional and violate of Article 21. In this example, the scope 'right to die'. But the debates over the trouble didn't forestall. Before P.Rathinam case in 1989 state of *Maharashtra v. Maruti Sharipati Duabi*¹⁵, the court said that the right to life beneath Article 21 of Indian Constitution court absorbed the question once more got here up for attention earlier than then Supreme Court within the case of *Gian Kaur v. State of Punjab*¹⁶. It's far outstanding to word right here that suicide became seemed as permissible in a few circumstance in historic India. ¹⁷In keeping with Hindu vedantic philosophy, death is not the cease of life. It is only the Sthula Sharira (bodily body), the dies it's far Shukshma Sarira (the astral body), that does not perish with the loss of life of the body. The beyond karmas (notion and deeds) remain on the Shukshma Sarira or astral bod, and are retained even after demise and going to Bhuvarko. The astral body then disintegrates and the components are merged within the ocean power with the everlasting Parma Brahma (the ultimate creator). Thereafter, they return by means of the will of god to another bodily frame and the character is reborn on this earth according with that character's deeds and karmas births and deaths. All of us are droplets or lumps of or simplest a part of the excellent ocean of energy when the body becomes not worthy to stay, the droplet of energy leaves the frame and enters to every other body. That is known as "transmigration of the soul". It is a continuous procedure¹⁸. In step with Vedantic philosophy, the Parma Brahma created the individual. God is gift inside the soul of the human being. God is the fabric reason and instrumentality of all joys, happiness, woes, sorrows, deeds and karmas of humanity. Simply as he gave life to us, he takes it away from us as nicely. He's the creator as well as the doer and the destroyer of this frame. Committing suicide one by no means received whatever in life. Committing suicide become an offence as according to Bhagavad Gita. Our soul atman after death of mortal frame in gift life once more manifests a decrease than present, what of sin incurred by means of committing suicide? With the aid of committing suicide, we once more suffered in life as our soul atman could appear a lower form of existence in next manifestation.

Section 309 of IPC deserves to be effected from the statute book to humanize our penal legal guidelines. Its miles a cruel and irrational provision and it may result in punishing someone who has suffered anguish and could be know-how ignominy due to his failure to dedicate suicide. Hon'ble Supreme Court has additionally expressed comparable view in *Aruna Ramachandra Shanbug v. Union of India&Ors*¹⁹. An act of suicide can't be said to be towards religion. Morality or public policy, and an act of attempted suicide haven't any baneful effect on society. Suicide or attempted to devote suicide causes no damage to other, consequently the state interference with the non-public liberty of the concerned individual is not called thus section 309 violate Article 21, and so void.

If someone has right to live Article 21 of the constitution, the query is whether or not he has a right now not to live. Logically, it need to comply with that the right to live encompass the right not to live, say the right to die or terminate one's existence right to live of which artwork 21 speaks of may be started to herald its trial the right not to live a forced existence. If someone, because of own family discord, distraction lack of pricey relation or other purpose of a like nature

¹⁴ (1994)3 SCC 394.

¹⁵ Criminal Law Journal, 743 (Bom).

¹⁶ (1996)6 SCC 648.

¹⁷ Pandey, R.B. 1969 Hindu Samskaras (Socio-Religious study of the Hindu Sacraments). Delhi. Motilal Banarisdas 327.

¹⁸ Balkrishn, "the right to die: Indian perspective", cited in kusum (Ed), suicide some reflection (New Delhi regency publication 1995), p.20.

¹⁹ AIR 2011 SC 1290: 2011 AIR SCW 1625.

overcomes the instinct of self-renovation and decides to take his life, he need to now not be held for an attempt to suicide. In such case the lucky guy deserves indulgence, sympathy and comfort rather than punishment²⁰. The question is whether or not the scope of Article 21 additionally consists of the right to die? While a person commits suicide, he has to adopt certain effective overt acts and the genesis of those acts can't be traced to be covered inside the protection of the right of life below Article 21. The extensive element of sanctity of existence is also not being neglected. ²¹Article 21 is a provision ensuring protection of life and personal liberty via no stretch of imagination can extinction of life be study to be protected in protection existence. The court reiterated that it's miles hard to construe Article 21 to encompass inside it the right to die as part fundamental right assured therein. Right to existence is herbal right embodied in element ill of constitution, however suicide is an unnatural termination or extinction of existence and therefore, incompatible and inconsistent with the concept of right to life section 306 enacts an awesome offence, that is able to life independent of section 309 IPC. Section 306 prescribes punishment for abetment to suicide. While section 309 punishes try to commit suicide. Abetment of try to suicide is out of doors the preview of section 306 and is punishable only beneath section 309 read with section 107 IPC²². The availability there affords for the punishment of abetment of suicide as well as abetment of try to devote suicide. Hence, even in which the punishment for try to dedicate suicide isn't considered appropriate, its abetment is made a penal offence. In other word, assisted suicide and try to dedicate suicide are made punishable for cogent motive within the interest of society.

The Indian Constitution under Article 21 confers the right to existence as the essential right of every citizen. The right to life enriched in Article 21 had been liberally interpreted so one can suggest something greater than mere survival and mere animal life. The Supreme Court has asserted that Article 21 is the coronary heart of the essential right provided below part 3rd of the Indian Constitution²³. The Supreme Court docket has sincerely said that in order to deal with a right as a fundamental it isn't always obligatory that it ought to be expressly stated as an essential right²⁴. Any form that entails unnatural termination of life is unlawful, because of which there may be no right to die²⁵. The extent of credibility accorded to the sanctity of existence and the right to life as a whole is proven from the culpability of offence besides, it would be apt to comment that decriminalization of euthanasia is unworkable in Indian perspective, even on humanitarian grounds, as it includes third person and the chances of misuse exist to a massive volume.

ETHICAL AND SOCIAL ISSUES AND RIGHT TO DIE IN INDIA.

SOCIAL ISSUES

Hinduism and Buddhism be given the right to die (Prayopavesha) for those who are suffering from terminal disease or the ones who've completed by using their aims in lifestyles. Its manner for those who have completed performing all of the responsibilities and obligations that had been assigned to them and their frame is now a burden. Folks who are content with their lives as step with Hindu Mythology Lord Rama and his brothers took 'jal Samadhi' in river Saryu near Ayodhya. Lord Buddha attained demise by searching for it. In assessment suicide is an unexpected act. It's far related to the emotions of anger, frustration, and despair and so on. Folks that are not content with their lives will be inclined to commit suicide. Its miles because of this motive that suicide is not allowed in any those religions.²⁶

²⁰Dwarka Pooja v. Emperor (1912) 14 Bom L.R. 146.

²¹P. M Baskshi, the Constitution of India, pp46-48.

²²Indian Penal Code.

²³P.M Baskshi, the Constitution of Indian.

²⁴Manaka Gandhi v. Union of India AIR 1978 SC 597.

²⁵Refer to Right to Life or Death? For Bharat Both Cannot be 'Right', by B.B Pande, (1994)4 SCC (Jour.) 19.

²⁶Beauthamp, T.L (2003) 'method & principle in biomedical ethics', Journal of medical ethics 29(5): 269-274.

As in step with Medical Ethical Regulations-2002 recommendations²⁷ practicing euthanasia shall represent unethical behavior. However, on particular event, the question of retreating assisting gadgets to sustain cardiopulmonary characteristic even after demise, shall be determined only a group of medical doctors and withdrawal of support machine. Such group shall consist of the physician in-charge of the patient, chief medical officer/ clinical officer in-charge of the health facility and a health practitioner nominated by means of in-charge of the health facility from the clinic personal or according with provision of the organ Act.

ETHICAL ISSUES

Ethical increases a number of agonizing ethical dilemmas²⁸

- Cognitive impairment and euthanasia.
- Autonomy- the right to refuse treatment
- Euthanasia of non-terminally ill human beings
- Personhood

The talk of over personhood is essential to the problem of euthanasia. Some bioethicists declare that any cognitively human could qualify as a non-man or woman. Whilst others claim that the most effective residing non character are chronic vegetative state individual's, anencephalic, and probably fetuses. A non-man or woman would now not have ethical, or prison rights and protections.

- The principle of double effect

This principle justifies giving ache remedy treatment even though it has the effect of shortening existence, provide the primary intention was to relieves the pain, now not to kill the patient every now and then referred to as terminal sedation, while it's far used accurately as palliative care, the patient is sedated and death ensues from the underlying illness, euthanasia combatants but, say it's miles hypocritical. To permit to relieve pain however no longer when the intention is to hasten demise.

- Futile care theory and healthcare rationing
- The disabled and euthanasia
- Ethical relativism

The ethics of euthanasia raises a number of agonizing dilemmas: is it ever right to end the life of a terminally sick patient who is present process extreme ache suffering, under what situations can euthanasia be justifiable, if in any respect, is there an ethical difference between killing someone and allowing them to die, at the heart of these arguments are the one-of-a-kind ideas that human beings have about that means and of human life, should human beings have the proper to decide on problems and death. There are also a number of arguments based on realistic troubles. Some human assume euthanasia shouldn't even if it became morally rights, because it can be abused and used as a cover for homicide.

CONSTITUTION PROVISIONS RELATING TO RIGHT TO DIE IN INDIA

Section 300 IPC²⁹ for homicide states as follows "besides in the cases hereinafter excepted, culpable murder is murder, life the act through which the death is prompted is carried out with aim of inflicting loss of life, or it's miles finished

²⁷ JIAFM, 200:28(3) ISSN: 0971-0973.

²⁸ www.life.org.nz/euthanasia/euthanasiaethicalkeyissues

²⁹ Dwarkar Pooja v. Emperor (1912) 14 Bom L.R. 146

with the goal of inflicting such physical injury because the wrongdoer is aware of to be reason the loss of the man or woman whom the damage is brought about”.

Accordingly, in step with criminal law either of two conditions have to be met-aim and knowledge. The petitioner ought to prove reason at the doctor for act construed as homicide, in a doctor-patient counting, the cause is to offer therapy or care until mounted to be otherwise, the weight of evidence resting with the appellant, the principle of earlier knowledge is inapplicable as an choice is taken into consideration handiest when remedy options are located to be ineffective to save you death or intolerable incapacity. Therefore, the business enterprise of demise is resulting from the underlying disorder circumstance as opposed to the withdrawal of synthetic aid. That is indeed a “failure to struggle” or “letting die” instead of a fine act to give up the existence of affected person³⁰. In as much as clinical interventions are artificial and accepted with the aid of the patient through knowledgeable consent is withdrawn while not beneficial. Therefore, those motion at the part of the doctor gazing due clinical strategies are to be decriminalized. That is the clean role of landmark judgment quoted within the Aruna Shanbaug case.

In as a whole lot as medical interventions are artificial and ordinary through the affected person through consent on the know-how that they might be useful, there no vital to hold, when the consent is withdrawn when now not beneficial. Consequently, those action at the part of the doctor watching due clinical techniques are to be decriminalized. This is the clean role of a landmark judgment quoted inside the Aruna Shabaug case.³¹ In Airedale National Health Care accept as true with versus Bland (United Kingdom), Lord Keith remarked³² “a medical practitioner is under no obligation to keep to treat this sort of affected person where a larger body of informed and accountable scientific opinion is to the effect that no advantage at all would be conferred by continuance of the treatment”. That is additionally popular position international. The opportunity to such interventions isn’t always “no remedy” or abandonment. This false impression should be replaced with the aid of the tremendous concept of comfort care or palliative care. The latter is an extra holistic care in place of the burdensome technique of interventions. It shifts the focal point to excellent of existence of the affected person via addressing the physical, mental, and spiritual wishes. Continuing artificial feeding may also actually give upward thrust to undesirable symptoms or extend the death process without mitigating suffering³³. The problem of scientific interventions and their removal, difficulty to preconditions is extensively frequent now extending additionally to implantable left vermicular help devices. Affected person’s right override different considerations in deciphering Section 300, 306 and 309 Indian Penal Code³⁴. Those selections are intended to be taken forward on the circumstance of acceptability to all events following open discussion of troubles relevant to the patient’s medical reputation. Defenses available for available for criminal legal responsibility from the information of viable ham at some point of the life guide withdrawal these are while interpreted in context of care of the demise patient.

JUDICIAL PRONOUNCEMENTS ON RIGHT TO DIE IN INDIA

In a milestone verdict increasing the right to life to include the right to die with dignity, the Supreme Court legalized passive euthanasia and accepted ‘living will’ to offer terminally unwell patients or those in chronic and incurable and incurable vegetative country a dignified go out by means of refusing clinical treatment of existence support.

³⁰ Law Commission of India, 196th Report. Medical treatment of terminally ill patient (for life protection of patients & medical practitioner); 2006 <http://Lawcommissionofindia.Ric.in/report/rep 196.pdf>.

³¹ Aruna Shanbaug v. Union of India, international journal of legal insight volume 1, issue 3 ISSN: 2456-3595.

³² Black H, editor. The Consumer law dictionary 6th Ed Eagan, Minnesota, USA: west publication co: 1994 p 554.

³³ Fisher MM, Raper RF. Court, doctors & end-life care intensive care med 2005; 31:762-4.

³⁴ Abhinav Misra, Indian Penal Code 1860.

³⁵The decision, the latest in string of boosts for man or woman freedoms by way of the apex court docket, turned into added by a constitution bench of chief justice Dipak Misra and Justice A.K Sikri, A.M Khaanwilkar, D. Y Chandrachud and Ashok Bhushan. It empowers a person of sound mind and fitness to make a 'dwelling will' specifying that within the occasion of him/her slipping into a terminal clinical situation in future, his/her life must now not be prolonged through existence assist system. The man or woman worried also authorize or buddy to decide in charter with medical, while to pull the plug.

Given Indian sensitivities approximately existence and loss of life, trying out the legality of the concept posed a complex medical, philosophical, constitution and spiritual jigsaw for the bench. Showing an extraordinary unanimity of thought to weave a common constitutional precept, CJI Misra led his colleagues at the bench to harmonies the inevitable yet contrary facets life and death and say in unison that "right to die with dignity is an intrinsic side of right to life guaranteed below Article 21". With this ruling, the SC has recognized that an person with terminal contamination or in a state of irreversible vegetative situation has the company to determine whether or not he/she would like to die, a sphere which turned into up now constitutionally reserved for the country, which by myself ought to deprive a person of his/her life in accordance with law.

³⁶In a cumulative 538-page judgment containing four review, the SC said passive euthanasia, or a provision for passive euthanasia through advance directive or 'living will', might shop "a helpless character from uncalled for and useless treatment when he's considered as simply a creature whose breath is felt or measured because of superior more era". There comes a section in life while the spring of existence is frozen, the rain of movement turns into dry, the motion of frame end up motionless, the rainbow of life becomes colorless and the word 'life' which one name a dance in area and time grow to be still and blurred and the inevitable dying comes close to maintain it as an octopus gripping firmly with its tentacles so that the individual 'shall upward thrust up never', CJI Misra sated.

CONCLUSION

The human being finest freedom is to live and die. In keeping with one's very own wish and religion. Life must be protected. We have to additionally permit people to have a human dignified loss of life. Individuals have a right to terminate the time and situation of their death. While human being near death and unbearable ache or affliction, they have to be free to be looking for clinical assistance in finishing their very own valuable lives. It has lengthy been diagnosed that patients have a right to reject life guide technology, or to have freedom it withdrawn while attempt to expand life are futile. Similarly suffers should be approved to are seeking health practitioner's help after they choose do so the ultimate supreme court of India accepted passive euthanasia or withdrawing existence help to affected person's permanently vegetative state in sure situation. The court rejected active euthanasia of finishing life through admistartion of lethal substances. The Supreme Court choice has highlighted a significant legislative lacuna on the matter of euthanasia. It is up parliament to remember these complexities and in all likelihood rethink our founding ideas in process, even as drafting an invoice on challenge of euthanasia or right to die. Meanwhile, society wishes to be touchy to the issue. Focus to people about regulation and medical technology might prepare them to take decision at suitable time in view that following day there can be remedy to a clinical state perceived as incurable these days.

³⁵ Time of India News March 10, 2018, 08:10 IST. Last updated : APR 30, 2019, 09:15 pm IST.

³⁶<http://timeofindia.indiatimes.com/articleshow/63239760.com=contentofinteres&utmmedium=text&campaiag=cppst>. Last updated : APR 30, 2019, 09:15 PM IST.