

Voluntary Assisted Dying (VAD) in Indonesia: Can It Follow Australia's Footsteps?

Christopher Martin, University of New South Wales–UNSW Sydney, Australia

The Asian Conference on the Social Sciences 2024
Official Conference Proceedings

Abstract

This paper investigates the differing approaches to Voluntary Assisted Dying (VAD) in Australia and Indonesia, with a focus on the legal structures and motivations underlying each nation's stance. While Australia has embraced VAD, enacting laws in six states, Indonesia faces ongoing challenges rooted in cultural and religious beliefs, resulting in the prohibition of VAD. The paper scrutinises Australia's rationale for human rights, emphasising adherence to the International Covenant on Civil and Political Rights (ICCPR), and explores the legal framework through key cases and legislative processes. On the other side, Indonesia's legal landscape, shaped by Pancasila principles and religious beliefs, prohibits VAD under Article 344 of the Criminal Code. The paper contemplates the potential for future VAD legalisation in Indonesia, suggesting avenues such as consultations with religious leaders, judicial review, and legal amendments, while emphasising the importance of honoring international human rights commitments. The conclusion underscores the unique cultural and legal challenges Indonesia faces in pursuing VAD legalisation, different from Australia's approach.

Keywords: Voluntary Assisted Dying (VAD), Human Rights, Indonesia, Australia

iafor

The International Academic Forum
www.iafor.org

Introduction

Voluntary Assisted Dying (VAD) delineates a structured framework that facilitates individuals in the advanced stages of severe, debilitating illnesses, marked by intolerable suffering, to solicit medical intervention for the purposeful cessation of their lives. Upon satisfying specific criteria and adhering to requisite legal processes, individuals are afforded the option to either self-administer or secure the prescription of the specified substance for VAD from a duly licensed physician. The decision-making process places a paramount emphasis on individual autonomy, with any external influences, pressures, or coercion explicitly deemed illicit and ethically unsound. This ethical construct seeks to provide a compassionate alternative for those contending with protracted affliction, navigating the intricate intersection of personal autonomy and the stringent legal and ethical mandates governing this nuanced terminological choice (Health.nsw.gov.au, 2023).

VAD legislation is presently operational in all six Australian states: Victoria, Western Australia, Tasmania, South Australia, Queensland, and New South Wales, instigating pervasive nationwide debates. Remarkably, the Northern Territory and the Australian Capital Territory persist in proscribing VAD, instigating comprehensive deliberations concerning ethical, human rights, and government regulatory considerations. Anticipated to endure as a prominent issue, this situation has catalysed extensive discourse within the realms of Australian public and political arenas. The multifaceted nature of these debates underscores the nuanced interplay between legal, ethical, and societal dimensions surrounding end-of-life choices, emphasising the imperative for comprehensive and informed public and political engagements on this intricate matter (Health.nsw.gov.au, 2023). Contrastingly, VAD, often referred to as 'Euthanasia', stands proscribed within the legal framework of Indonesia. Indonesian jurisprudence exhibits a conspicuous absence of recognition or validation for the underpinning motivations associated with VAD. Specifically, Article 344 of the Indonesian Criminal Code categorically precludes the deliberate termination of human life through this modality. This legal stance underscores the nonalignment of Indonesian law with the permissiveness observed in certain Australian jurisdictions, reflecting a distinctive legal paradigm. The proscription of VAD in Indonesia invokes complex ethical and moral considerations, shaping a unique discourse within the broader global dialogue on end-of-life decisions (Syahroel, 2022, p. 357).

This paper seeks to examine the divergent trajectories of Voluntary Assisted Dying (VAD) frameworks in Australia and Indonesia, accentuating the legal intricacies and motivational underpinnings that delineate Australia's widespread embracement of VAD in stark contrast to Indonesia's enduring complexities and reluctance regarding this end-of-life prerogative. The analysis will extend to probing the prospects for prospective VAD legalisation in Indonesia, encapsulating a comprehensive exploration of the legal, cultural, and ethical dimensions that contribute to the distinctive VAD landscapes in these two jurisdictions.

Statement of the Problem

This paper seeks to address several critical questions:

1. In what manner is Voluntary Assisted Dying (VAD) perceived within the human rights framework in Australia?
2. What legal frameworks govern the process of legislating VAD in Australia, encompassing the delineation of parameters and procedural intricacies involved in its enactment?

3. What factors contribute to the regulatory constraints on VAD within the legal framework of Indonesia, with particular emphasis on ethical considerations, cultural perspectives, and legal complexities?
4. What legal foundations underlie the constraints on VAD within the Indonesian jurisdiction, highlighting statutory provisions and their ethical and cultural underpinnings?
5. To what extent is the prospect of legalising VAD feasible in Indonesia, and could the Australian model serve as a viable paradigm for potential adoption, considering the legal, cultural, and ethical dimensions inherent in both jurisdictions?

Purpose of the Study

This study is designed to accomplish several key objectives. Firstly, it aims to investigate the alignment of Voluntary Assisted Dying (VAD) with the principles of human rights within the Australian context. Through this exploration, the research seeks to offer a nuanced understanding of how the practice of VAD intersects with ethical considerations and upholds the principles of individual autonomy in the context of end-of-life choices.

Additionally, the study endeavours to analyse the intricate legal frameworks that underpin the legislation of VAD in Australia, emphasising the statutory structures and procedural intricacies inherent in its legislative enactment. Furthermore, the research will scrutinise the diverse factors contributing to the regulatory constraints on VAD in Indonesia, encompassing ethical, cultural, and legal dimensions. By examining the legal foundations of VAD restriction in Indonesia, the study aims to elucidate the statutory provisions and their ethical and cultural underpinnings.

Lastly, the research will explore the feasibility of Indonesia adopting VAD, considering the Australian model as a potential framework. This entails a comprehensive evaluation of the legal, cultural, and ethical dimensions inherent in both jurisdictions to ascertain the practicality and challenges associated with such adoption. Through these inquiries, the study aims to contribute valuable insights to the discourse on end-of-life choices in Australia and Indonesia.

Methodology

Type of Research, Nature of Research, and Research Approach

Type of Research

This research is juridical-normative, delving into legal doctrines and principles (Sugiyono, 2010, p. 2) by examining existing literature materials such as books, journals, and relevant regulations. The juridical-normative method is chosen due to the research object and purpose, focusing on the study on a distinct Voluntary Assisted Dying (VAD) regulation in Australia and Indonesia.

Nature of Research

The research is descriptive, systematically portraying specific objects and describing related aspects by presenting facts or characteristics of the population in a particular field accurately and factually (Azwar, 2011, p. 7).

Research Approach

The applied approach is legislative. The legislative approach involves examining all case laws and legislations related to the legal issue under consideration (Marzuki, 2010, p. 93). This includes dissecting regulations and literature related to the legal issue at hand, examining the legal issues present in legislation, and reviewing literature related to the main discussion.

Data Sources

The data sources are secondary and consist of legal literature materials and documents related to the presented issues. Primary legal sources include legal regulations binding in the Australian Legal System such as Case Laws and Legislations, as well as legal regulations binding in the Indonesian Legal System such as the Indonesian Criminal Code. Additionally, secondary legal sources, such as books and literature, are utilised. Tertiary legal sources, like legal dictionaries and other relevant documents, provide guidance and explanations for primary and secondary legal materials.

Data Collection Techniques

The primary data collection technique employed in this research is a literature review, where the author collects and discusses legal materials through primary, secondary, and tertiary legal sources.

Data Analysis

The data analysis method utilised is qualitative, aiming to provide a clear understanding of the legal, ethical, and cultural dimensions surrounding the Voluntary Assisted Dying (VAD) in Australia and Indonesia. The qualitative method is chosen to comprehend and interpret the truth found in the data systematically.

Voluntary Assisted Dying (VAD) in Australia

Human Right Rationales

Australia, a signatory to seven pivotal human rights treaties, particularly draws from the International Covenant on Civil and Political Rights (ICCPR) to outline its responsibilities regarding Voluntary Assisted Dying (VAD). The ICCPR, ratified by Australia on August 13, 1980, serves as a cornerstone for its obligations in this domain (Zdenkowski, 1996, p. 7).

The practice of VAD may trigger the following rights as outlined in the ICCPR:

- *Article 7 (Freedom from cruel, inhuman or degrading treatment)*
Article 7 obliges States to proactively prevent severe mistreatment within their jurisdiction. State's prohibition of VAD could result in subjecting individuals to cruel, inhuman, or degrading treatment (Humanrights.gov.au, 2016).

- *Article 17 (Respect for private life)*
Article 17 safeguards personal autonomy, allowing individuals to pursue self-fulfillment through actions that do not infringe upon the freedom of others (Nowak, 2005, p. 388).

The right to privacy encompasses bodily autonomy, extending to actions that may impact one's own health (Nowak, 2005, p. 389). Refusals of patient requests for VAD, despite their explicit wishes, can be seen as privacy violations (Nowak, 2005, p. 389).

Drawing upon human rights principles, Australia has legalised VAD to balance individual autonomy with societal interests. Nevertheless, VAD legalisation in Australia encountered significant challenges, as discussed in the following section.

Legal Framework of Voluntary Assisted Dying (VAD) Legalisation in Australia

Case Laws

The key cases regarding Voluntary Assisted Dying (VAD) in the common law countries under the British Empire including Australia, are:

- *R v Adams (1957)*

A landmark British legal case introduced the consequential 'double effect' principle in medical ethics, offering a vital ethical framework for physicians. This principle grants doctors the latitude to administer treatment aimed at alleviating pain and suffering in severely ill patients without facing charges of murder, even if an unintended consequence is the patient's passing. The 'double effect' principle, while acknowledging the unintended outcomes, underscores the paramount significance of palliative care in mitigating the profound suffering of patients. Importantly, this legal precedent not only safeguards medical practitioners from legal repercussions but also emphasises the ethical imperative of prioritising humane care. By recognising the complexities inherent in end-of-life decisions, it strikes a delicate balance between compassionate healthcare practices and the inherent uncertainties associated with medical interventions in severe cases. This legal and ethical construct reflects a societal commitment to navigating the moral complexities surrounding terminal illnesses with empathy and ethical consideration (Ipsaloquitur.com, n.d.-b).

- *R v Cox (1992)*

Dr. Cox faced charges of attempted murder for administering a potassium chloride injection to a terminally ill arthritis patient in pursuit of pain relief. The pivotal concern in the case revolved around Dr. Cox's intent. Asserting that his primary objective was pain relief, he invoked the doctrine of double effect, which typically absolves doctors when a patient's death is an unintended consequence of pain relief efforts. However, the jury's conviction underscored a crucial nuance: the doctrine does not apply when the primary intent is to terminate a patient's life. This legal precedent emphasises the paramount importance of pain relief in end-of-life care. While acknowledging the complexities surrounding the unintended consequences of medical interventions, the case highlights the imperative of transparent intent, especially in ethically sensitive scenarios where medical actions may have profound and unintended outcomes (Ipsaloquitur.com, n.d.-a).

Legislation

Voluntary Assisted Dying (VAD) falls under state jurisdiction as it is outside the legislative powers of the Federal Parliament under Section 51 of the Australian Constitution. The Northern Territory initially introduced VAD through the Rights of the Terminally Ill Act

(NT) between March 1996 and 1997. Nevertheless, the Australian Government exercised its power under Section 122 of the Australian Constitution to enact the Euthanasia Laws Act 1997, effectively invalidating the Northern Territory Act and bringing an end to the Northern Territory's voluntary assisted dying law (Qut.edu.au, 2023). The Euthanasia Laws Act 1997 also amended the Australian Capital Territory Act 1988 (ACT act) that prevent legislation to allow VAD (*Australian Capital Territory (Self-Government) Act 1988*, 1988, p. 23).

Over the next two decades, there were nine attempts to repeal the Euthanasia Laws Act of 1997 through various bills introduced in Parliament. It's crucial to mention that none of these repeal bills progressed to the voting stage in either parliamentary chamber (Ferris, 2022, p. 3). In 2018, Senator David Leyonhjelm reintroduced a bill in the Senate to eliminate the federal ban on Voluntary Assisted Dying (VAD), but this bill, too, was rejected by the Senate (Karp, 2018).

While VAD remains restricted in the Northern Territory (NT) and the Australian Capital Territory (ACT), the other six states in Australia have acknowledged the right to VAD. The states where VAD has been legalised and is in effect include Victoria (2019), Western Australia (2021), Tasmania (2022), Queensland (2023), and South Australia (2023). New South Wales, the final state to pass assisted dying legislation, is scheduled to implement it on November 2023 (Healthdirect.gov.au, n.d.).

While VAD is legal, strict eligibility criteria are consistent across states. To qualify, an individual must be an adult with Australian citizenship or permanent residency in the state for at least 12 months, demonstrate decision-making capacity, have a diagnosed condition expected to cause death within a specified timeframe, experience intolerable suffering due to an advanced condition, and maintain a persistent request for VAD (Healthdirect.gov.au, n.d.). These stringent VAD criteria maintain high medical ethical standards, ensuring it's employed only in appropriate situations. This balances individual rights with ethical and humanitarian considerations.

Restriction of Voluntary Assisted Dying (VAD) in Indonesia

The Belief that God is the Sole Taker of Life

Pancasila, meaning 'Five Principles', forms the fundamental basis of Indonesia's legal framework. These principles, expressed in Indonesian, guide all law-making and statute creation in the government and parliament, as Indonesia follows the civil law system. The primary principle in Pancasila relevant to VAD is the belief in the One and Only God (Morfit, 1981, p. 840). It signifies the acknowledgment of a belief in the Supreme God, the Creator of the natural world. In the context of VAD, when seen through the lens of the First Principle of Pancasila, the practice of VAD in Indonesia sharply contradicts the core essence of the diverse religious beliefs held in the nation (Marasabessy, 2014).

In terms of religions, VAD is discouraged in the officially recognised religions in Indonesia such as Islam, Protestantism, Catholicism, Hinduism, Buddhism, and Confucianism. These faiths emphasise the sanctity of human life as a divine gift and believe that the duration of life is determined by God. Thus, VAD is universally rejected within these religions, as they advocate leaving life-and-death matters to a higher power (Marwaha, 2006). These principles form the basis for a statute in Indonesia regarding the restriction of VAD, which will be discussed in the next section.

Legal Framework of Voluntary Assisted Dying (VAD) in Indonesia

Indonesia operates under a civil law system, which means that all actions are regulated or guided by statutory laws. VAD is no different in this regard. As previously mentioned, VAD contradicts the fundamental legal norms and principles, such as Pancasila, in Indonesia, one of which is rooted in religious teachings. Given that none of the six official religions recognised in Indonesia permit VAD, it follows that the statutory regulations established by the president together with the parliament should also prohibit VAD.

The legal rules pertaining to the prohibition of VAD in Indonesia are outlined in Chapter XIX on Crimes Against Life in Article 344 of the Indonesian Criminal Code, which states, “Anyone who takes another person’s life at the request of the person himself, which is clearly stated with sincerity, is threatened with a maximum imprisonment of twelve years.” This implies that this regulation prohibits all means of terminating human life, even if it is carried out upon the request of the individual (Atlantispress, 2023).

Even though Indonesia does not follow the *stare decisis* principle (doctrine of precedent) (Khairi, 2016), there are at least two notable cases in Indonesia that emphasise the restriction of VAD according to the Article 344 of the Indonesian Criminal Code.

First, the story of Hasan Kusuma. On October 22, 2004, Hasan Kusuma submitted a request to the Central Jakarta District Court for permission to euthanise his wife, Again Isna Nauli. His wife had been in a coma for two months and faced difficulties in paying for medical care. It was reported that, at that time, the Central Jakarta District Court rejected the euthanasia request (Hukumonline.com, 2014).

The second story pertains to Ignatius Ryan Tumiwa. A postgraduate graduate from a prestigious university, he wanted to end his life through lethal injection. However, his request was hindered by Article 344 of the Indonesian Criminal Code, which threatens doctors or other medical personnel who assist a patient in ending their life. Through his lawyer, Ryan submitted a request for the judicial review of this article to the Indonesian Constitutional Court. In August 2014, his request was withdrawn. The reason was that Ryan had found the motivation to embrace life once again. The withdrawal of the request was positively received by the constitutional judges who examined this petition (Hukumonline.com, 2014).

Considering Voluntary Assisted Dying (VAD) Legalisation in Indonesia Based on Australia’s Model

VAD has seen notable advancement in Australia, with legalisation in six of its states, as we previously discussed. In contrast, Indonesia has encountered hurdles in the process of legalising VAD, primarily because of religious and legal disparities. Nonetheless, it is worth to explore whether Indonesia might entertain the idea of adopting a framework similar to that of Australia.

Indonesia should primarily engage in consultations with religious leaders before considering the legalisation of VAD. Unlike Australia, where VAD is approached from a human rights perspective, Indonesia consistently grounds its legal regulations in religious principles. This aligns with Indonesia’s ideology, Pancasila, which places religious faith as the utmost priority.

Second, because Indonesia follows a civil law system, if it wishes to enact or legalise VAD, there are two possible avenues:

a. Seeking the Repeal of Article 344 of the Indonesian Criminal Code through a Judicial Review Process in the Constitutional Court

As mentioned earlier, Ignatius Ryan Tumiwa attempted this approach, but regrettably, he withdrew his request for a Constitutional Court review, leaving Article 344 of the Indonesian Criminal Code in effect without a final binding decision. Despite this, there remains the possibility for someone to file a new request for a future review to repeal this article. The judicial review process in Indonesia parallels that of Australia. The High Court of Australia can also adjudicate reviews of federal or state laws if they are believed to contravene the constitution (Peo.gov.au, n.d.).

b. Proposing an Amendment to the Indonesian Criminal Code Particularly Article 344

The second approach entails amending the law, a responsibility shared by the parliament and the president. These amendments should also take into account the desires of the public and religious leaders.

The process shares similarities with that of Australia, where the deliberation of legal amendments takes place in parliament. However, the notable difference lies in Australia's use of a bicameral system, comprising both an upper house and a lower house (Parliament.act.gov.au, n.d.), which implies that the law must undergo debate and approval in both houses in Australia. In contrast, Indonesia operates under a unicameral system, where discussions occur in a single chamber.

Thirdly, Indonesia should factor in international human rights considerations when legalising VAD. Much like Australia, Indonesia is a party to human rights conventions such as the ICCPR (Internet.ohchr.org, n.d.). Therefore, it's crucial for Indonesia to uphold its international obligations and align its standards when crafting regulations, especially in the context of VAD. Indonesia can also consult with international organisations and, if possible, cooperate with Australia in VAD legalisation deliberations.

Conclusion

The examination of Voluntary Assisted Dying (VAD) frameworks in Australia and Indonesia reveals divergent trajectories shaped by legal, ethical, cultural, and religious considerations. In Australia, VAD is perceived within the human rights framework as an embodiment of individual autonomy, compassion, and respect for personal choice in end-of-life decisions. Legal frameworks governing VAD in Australia have evolved through landmark case laws and state legislation, highlighting a delicate balance between individual rights and societal interests.

Conversely, Indonesia's regulatory constraints on VAD are deeply entrenched in religious beliefs, particularly the principle of acknowledging God as the sole taker of life, enshrined in Pancasila. The Indonesian Criminal Code explicitly prohibits VAD, reflecting the broader societal and cultural context that prioritises religious values over individual autonomy in end-of-life decisions.

Despite these disparities, the feasibility of legalising VAD in Indonesia, modeled after the Australian framework, remains a complex and challenging endeavor. Any prospective

legislative reforms in Indonesia would necessitate comprehensive consultations with religious leaders, considerations of international human rights obligations, and potential amendments to existing legal frameworks. Moreover, the distinct legal systems and cultural contexts between Australia and Indonesia further underscore the need for tailored approaches to VAD legalisation that respect each country's unique socio-cultural landscape.

In essence, while Australia's widespread embracement of VAD reflects a commitment to individual autonomy and compassion in end-of-life care, Indonesia's enduring complexities and reluctance towards VAD underscore the intricate interplay between legal, ethical, cultural, and religious dimensions. Moving forward, any discussions on the prospects for VAD legalisation in Indonesia should navigate these complexities with sensitivity, inclusivity, and a nuanced understanding of diverse perspectives, ultimately aiming to uphold both individual rights and societal values.

Acknowledgements

The successful completion of this research has been made possible through the gracious sponsorship provided by the Indonesian Ministry of Finance, specifically through Lembaga Pengelola Dana Pendidikan (LPDP). Their generous financial support enabled my participation in this esteemed international conference, facilitating valuable opportunities for academic enrichment and cross-cultural exchange.

I wish to express my profound gratitude to Mr. Md Abdur Razzak, whose role as a teaching fellow has been instrumental in shaping the intellectual rigor and scholarly depth of this work. His dedication to fostering an environment conducive to academic excellence has greatly contributed to the refinement of this research.

I extend my sincere thanks to both LPDP and Mr. Md Abdur Razzak for their unwavering support and invaluable contributions, without which the realisation of this academic endeavor would not have been possible.

References

- Atlantispress. (2023). Juridical Analysis of Euthanasia (Right to Death) Based on Article 344 of Indonesian Criminal Code and Law Number 39/1999 Concerning Human Rights.
- Australian Capital Territory (Self-Government) Act 1988. (1988). 23.
- Azwar, S. (2011). Metode Penelitian [Research Methodology]. Pustaka Pelajar.
- Ferris, L. (2022). Parliament of Australia, Restoring Territory Rights Bill 2022 (Digest No.5, 2022-23, 3 August 2022).
- Healthdirect.gov.au. (n.d.). Voluntary Assisted Dying. Health Direct. Retrieved January 15, 2024, from <https://www.healthdirect.gov.au/voluntary-assisted-dying>
- Health.nsw.gov.au. (2023, June 5). Voluntary Assisted Dying. New South Wales Government. <https://www.health.nsw.gov.au/voluntary-assisted-dying/Pages/voluntary-assisted-dying-in-NSW.aspx>
- Hukumonline.com. (2014). Eutanasia Bertentangan dengan UUD 1945, HAM, dan Pancasila. 18. Hukumonline.com
- Humanrights.gov.au. (2016, May). Euthanasia, Human Rights and the Law. Australian Human Rights Commission. <https://humanrights.gov.au/our-work/age-discrimination/publications/euthanasia-human-rights-and-law#fnB239>
- Internet.ohchr.org. (n.d.). Ratification Status for Indonesia. United Nations Human Rights Treaty Bodies. Retrieved January 15, 2024, from https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=80&Lang=EN
- Ipsaloquitur.com. (n.d.-a). R v Cox Crown Court. Ipsa Loquitur. Retrieved January 15, 2024, from <https://ipsaloquitur.com/criminal-law/cases/r-v-cox>
- Ipsaloquitur.com. (n.d.-b). R v Dr Bodkins Adam Crown Court. Ipsa Loquitur. Retrieved January 15, 2024, from <https://ipsaloquitur.com/criminal-law/cases/r-v-dr-bodkins-adams>
- Karp, P. (2018, August 15). Euthanasia Bill Defeated in the Senate after Senators Reverse Position. The Guardian. <https://www.theguardian.com/australia-news/2018/aug/15/euthanasia-bill-in-doubt-as-two-senators-reverse-position>
- Khairi, M. (2016, April 29). Indonesian Legal Review: Language Law. SSEK. <https://ssek.com/blog/indonesian-legal-review-language-law/#:~:text=It%20is%20also%20to%20be,bound%20by%20previous%20court%20decisions>
- Marasabessy, M. A. (2014, August 14). Eutanasia Bertentangan dengan UUD 1945, HAM, dan Pancasila. Hukum Online. <https://www.hukumonline.com/berita/a/eutanasia-bertentangan-dengan-uud-1945-ham-dan-pancasila-lt53ec87bad54c6/>

- Marwaha, S. B. (2006). *Colors of Truth Religion, Self and Emotions: Perspectives of Hinduism, Buddhism, Jainism, Zoroastrianism, Islam, Sikhism and Contemporary Psychology*. Concept Publishing.
- Marzuki, P. M. (2010). *Penelitian Hukum [Legal Research]*. Kencana.
- Morfit, M. (1981). *Pancasila: The Indonesian State Ideology According to the New Order Government*. University of California Press, 21(8), 840.
- Nowak, M. (2005). *UN Covenant on Civil and Political Rights: CCPR Commentary (2nd rev)*. NP Engel.
- Parliament.act.gov.au. (n.d.). *Australian Levels of Government*. Legislative Assembly for the Australian Capital Territory. Retrieved January 15, 2024, from <https://www.parliament.act.gov.au/visit-and-learn/resources/factsheets/australian-levels-of-government#:~:text=The%20Federal%20Parliament%20is%20bicameral,individual%20electorates%20all%20around%20Australia>
- Peo.gov.au. (n.d.). *What Is Judicial Review?* Parliamentary Education Office. Retrieved January 15, 2024, from <https://peo.gov.au/understand-our-parliament/your-questions-on-notice/questions/what-is-judicial-review/#:~:text=A%20person%20seeking%20to%20obtain,power%20to%20make%20the%20decision>
- Qut.edu.au. (2023). *Voluntary Assisted Dying*. Queensland University of Technology. <https://end-of-life.qut.edu.au/assisteddying>
- Sugiyono. (2010). *Metode Penelitian hukum Kuantitatif, Kualitatif, dan R&D [Methods of Legal Research: Quantitative, Qualitative, and R&D]*. Alfabeta.
- Syahroel, A. (2022). *Juridical Analysis of Euthanasia (Right to Death) Based on Article 344 of Indonesian Criminal Code and Law Number 39/1999 Concerning Human Rights*. *Proceedings of the International Conference on Business Law and Local Wisdom in Tourism (ICBLT 2022)*, 357.
- Zdenkowski, G. (1996). *Human Rights and Euthanasia*. Research Paper, Australian Human Rights and Equal Opportunity Commission, 7.

Contact email: christophermartinnnn@gmail.com