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## Inheritance Rights in Cases of Euthanasia: Analyzing Legal and Ethical Complexities

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### ABSTRACT

This study analyzes the implications of inheritance law related to euthanasia, focusing on legal comparisons in different jurisdictions and perspectives of Islamic law. This study highlights legal loopholes that often arise in cases of euthanasia related to inheritance distribution, especially in the context of the legal system that regulates such actions. Through the approach of analyzing legal literature, sharia maqashid, and jurisdictional comparison, it was found that there was a significant variation in the legal treatment of inheritance claims by individuals involved in euthanasia. In some jurisdictions, such as the Netherlands and Belgium, inheritance claims are still possible with certain conditions, while other jurisdictions, including Indonesia, do not yet have explicit regulations. This study also emphasizes the importance of analyzing aspects of written consent, medical conditions, and moral and ethical principles in deciding inheritance rights. From the perspective of Islamic law, it is found that the principle of preserving the soul (hifz al-nafs) is the basis for rejecting the act of euthanasia. These findings make an important contribution to understanding the relationship between euthanasia and inheritance, as well as offering a legal discourse that supports the development of regulations based on justice, ethics, and human values. This research is a foothold for policymakers to overcome regulatory gaps related to euthanasia in the context of inheritance law.

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## 1. INTRODUCTION

Euthanasia, as an issue that touches on the moral, medical, and legal realms, continues to be a complex debate in various parts of the world (Hafidz et al., 2024). In a medical context, euthanasia is often considered a solution to end the suffering of patients with terminal conditions that cannot be cured. However, in a legal and social context, the decision to end one's life through euthanasia or assisted suicide raises questions that are not easy to answer, especially related to the distribution of inheritance (Chekhovska et al., 2019). Inheritance law, which basically aims to regulate the distribution of assets after a person's death, becomes a very complex subject when dealing with euthanasia cases (Zaborovskyy et al., 2021). The act poses a major dilemma, as it involves the overlap between morality, ethics, and legal regulation, both at the national and international levels.

The main problem in this study is the lack of regulation that regulates the relationship between the act of euthanasia and one's inheritance rights. In some jurisdictions, such as the Netherlands and Belgium, euthanasia has been legalized with strict procedures, but the relationship to the distribution of inheritance is still a matter of debate (Emanuel et al., 2016; Lemmens, 2018). In contrast, in Indonesia, euthanasia is considered illegal and contrary to religious norms and social values, making it difficult to determine the legal status of individuals involved in the act (Kusuma & Khoiroh, 2024). This raises an urgent question: Is the individual who chooses euthanasia or assists in the act still entitled to receive or bequeath property? This question becomes increasingly complex in the context of Islamic law, which emphasizes the principle of the sanctity of life (*hifz an-nafs*) as one of the *maqashid* of sharia (Tohari et al., 2022).

The existing literature shows different pros and cons views on this issue. Proponents of the legalization of euthanasia argue that the right of individuals to determine their own end of life is part of human freedom and dignity. This perspective emphasizes the importance of reducing unnecessary suffering, especially in medical conditions that have no hope of recovery (Chekhovska et al., 2019). For example, the laws in the Netherlands and Belgium allow euthanasia on the condition of the patient's written consent and a valid medical recommendation (Emanuel et al., 2016). On the other hand, those who reject euthanasia argue that this act violates the principle of the sanctity of life, which is a universal value in many religions, including Islam. In Islam, euthanasia is considered incompatible with the principle that life is a gift from Allah that should not be ended intentionally by humans (Kusuma & Khoiroh, 2024; Lemmens, 2018). Verses of the Qur'an in QS. Al-Ma'idah [5]: 32 affirms the importance of respecting human life and prohibiting killing without lawful cause according to the Shari'a (Ashath et al., 2024).

Previous research has discussed the medical and ethical aspects of euthanasia in depth, but very few have explored its implications for inheritance law, especially in the context of Islamic law and comparative international law. Study by Harisy (2018) suggests that individuals who choose euthanasia in certain jurisdictions can still file inheritance claims, but this study does not explore how Islam views these rights. Meanwhile, research by Jaafar (2023) It focuses on the principle of *Maslahah Mursalah* in determining the inheritance status of individuals involved in euthanasia, but lacks an in-depth analysis of the comparison of regulations in other jurisdictions. This research gap reflects the need for a comprehensive study that connects the perspective of Islamic law with global legal regulations related to euthanasia and inheritance distribution.

This study aims to fill the gap by analyzing how the act of euthanasia affects inheritance rights in the perspective of Islamic law and a comparison of global jurisdictions. The main objective of this study is to provide legal clarity for decision-makers, both at the individual and institutional levels, in dealing with cases involving euthanasia. The output of this research is expected to contribute to the development of inheritance law, both in national and international contexts. First, this research can be the basis for the development of new, more inclusive regulations, especially in Indonesia, where euthanasia has not been explicitly regulated in positive law. Second, this research contributes to the academic literature by providing a comprehensive analysis of the

relationship between euthanasia and inheritance law, which previously received little attention. Third, this research provides practical insights for legal professionals, doctors, and policymakers in handling cases involving euthanasia.

## **2. METHODS**

Research on the implications of inheritance law related to euthanasia takes a comprehensive and complex approach in analyzing its impact on aspects of life and inheritance. The methodological approach used includes literature study, comparative law research, interviews and surveys, case study analysis, interdisciplinary approach, and in-depth data analysis (Darmalaksana, 2022).

Literature reviews involve in-depth analysis of legal articles, research reports, and court decisions relevant to the topic from various jurisdictions. A comparison of laws from multiple countries allows for the identification of differing legal approaches to euthanasia and inheritance, highlighting the implications that may arise in inheritance claims. Interviews with legal experts, doctors, judges, as well as the families of patients and heirs play an important role in gaining first-hand perspectives on the matter. The survey was also conducted to evaluate the public's views on the implications of inheritance law in the context of euthanasia (Marpaung, 2018).

Case study analysis helps in a further understanding of previous legal decisions, while an interdisciplinary approach allows for the incorporation of aspects of ethics, medicine, and sociology to gain a more comprehensive understanding. All data collected from various sources are then carefully analyzed to identify trends, patterns, and legal implications that may arise. The results of this study are then carefully interpreted to formulate strong conclusions as well as recommendations that can affect the legal and inheritance domains in this sensitive context.

## **3. RESULTS AND DISCUSSION**

### **Euthanasia in a Global Perspective**

Euthanasia, as a deliberate act to end the life of someone who has suffered severe or incurable, continues to be an intensely debated issue in various parts of the world (Chukwudebelulu et al., 2024). Globally, approaches to euthanasia vary widely, depending on the legal, social, and cultural context of each country. In Europe, countries such as the Netherlands, Belgium, and Luxembourg have legalized euthanasia with strict conditions. Laws in these countries stipulate that euthanasia can only be performed with the patient's conscious consent, medical recommendations, and verification by an independent ethics committee (Marijnissen et al., 2022). In the Netherlands, for example, doctors who perform euthanasia are obliged to ensure that the patient experiences unbearable suffering with no hope of recovery, and this can only be done after consultation with at least one other independent doctor (Van Veen et al., 2022).

However, in countries such as the United Kingdom and most of the United States, euthanasia remains illegal, although there are some jurisdictions that allow assisted suicide, such as Oregon, Washington, and California (Castro et al., 2016). These differences often reflect the moral and cultural values that prevail in each country. In countries that ban euthanasia, the main argument is respect for life's values and the potential for abuse if the act is legalized. Meanwhile, in countries that legalize it, the underlying reason is respect for the right of individuals to determine their own end of life (Rudnev & Savelkaeva, 2018).

In Asia, the approach to euthanasia tends to be more conservative, influenced by traditional and religious values. Japan, for example, despite having a high level of social acceptance of euthanasia, still does not have clear legal regulations regarding this action (Kono et al., 2023). In Indonesia and Malaysia, euthanasia is considered contrary to religious principles and positive law. The legal systems in these two countries emphasize the importance of maintaining the sanctity of life as a fundamental value (Baharudin, 2020). In Islam, euthanasia is considered an act that is

contrary to the will of Allah SWT, as affirmed in QS. Al-Ma'idah [5]: 32 on the prohibition of taking life without a valid reason (Harisy, 2018; Kusuma & Khoiroh, 2024).

However, there are medical approaches such as palliative medicine that are increasingly recognized in many countries, including Muslim countries. Palliative care aims to improve the quality of life of patients without directly ending their lives. In this context, this approach is considered a more ethical solution than euthanasia. Palliative medicine is often an accepted alternative for conservative communities, including in Indonesia, because it respects local religious and cultural values.

### **Ethical and Religious Perspectives on Euthanasia**

Religious perspectives on euthanasia are very diverse. In the Christian tradition, especially in Roman Catholicism, euthanasia is considered an act of sin that violates God's law (Grove et al., 2022). Pope John Paul II, in his encyclical *Evangelium Vitae*, unequivocally stated that euthanasia is an unacceptable form of murder, regardless of the reasons behind it. On the other hand, some of the more liberal Christian denominations show higher rates of acceptance of assisted suicide, as long as it is done to reduce unbearable suffering (Bando, 2018).

In the context of Islam, most scholars reject euthanasia because of the principle of the sanctity of life (*hifz an-nafs*), which is one of the *maqashid* of Sharia. Human life is considered a mandate from God, and only He has the authority to take it. However, in certain situations, some scholars allow medical measures that can indirectly hasten death, such as stopping ineffective treatment, provided that there is no intention to end life directly (Rizka & Budiono, 2022). This approach is known as "passive euthanasia" and is seen as more acceptable than "active euthanasia".

On the other hand, Hindu and Buddhist views tend to be more flexible. In the Hindu tradition, the act of euthanasia is acceptable in situations where a person experiences insurmountable suffering, provided that the act is carried out without violating the principle of karma. In Buddhism, the decision to euthanize is often associated with the principle of compassion (*bouna*), although this action remains controversial because it goes against the basic principle of not taking lives (Grove et al., 2022).

### **Inheritance in a Global Perspective**

Inheritance law has significant variations in different countries, depending on the prevailing legal system. In Western countries, such as the United Kingdom and the United States, inheritance law is based on a civil or common law system, which allows individuals to determine how their estate is distributed after death through a will. However, in the case of euthanasia, some countries impose certain restrictions on inheritance rights for the individuals involved. For example, in the United States, *the slayer statute* rules prohibit a person involved in the death of an heir from receiving a share of the inheritance (Chekhovska et al., 2019; Emanuel et al., 2016). This rule is based on the principle that a person should not benefit from his or her unlawful or ethical actions.

In countries with religious-based legal systems, such as in the Middle East, inheritance law is generally governed by sharia principles. In Islam, inheritance is regulated in detail in the Qur'an, especially in QS. An-Nisa [4]: 11-12. The main principle in Islamic inheritance law is justice, where each heir receives a predetermined share based on their kinship relationship with the deceased (Rahmatillah, 2017). In the context of euthanasia, Islamic law tends to reject inheritance claims from individuals involved in actions that are considered to violate sharia law. This is based on the principle that actions contrary to sharia can void a person's right to inheritance.

### **Variations of Inheritance Law in the Context of Euthanasia**

Euthanasia, although it is a global issue, is regulated differently in different countries, both in terms of legality and its implications for inheritance law. In countries that legalize euthanasia, such

as the Netherlands, Belgium, and Canada, the law provides space for individuals to perform these acts under strict supervision, including legal procedures and medical approval. For example, in the Netherlands, euthanasia is legalized through *the Termination of Life on Request and Assisted Suicide (Review Procedures) Act* of 2002, which stipulates that this procedure can only be carried out if the patient faces unbearable suffering with no hope of recovery, and consent is given consciously. In Belgium, the legalization of euthanasia even covers underage patients under certain conditions, while in Canada, *Medical Assistance in Dying (MAiD)* gives patients access to the procedure, including their rights to inheritance distribution (Emanuel et al., 2016).

In contrast, in countries that prohibit euthanasia, such as Indonesia and the majority of Middle Eastern countries, the law expressly prohibits this act based on religious, moral, and positive legal principles. Indonesia, for example, through the Criminal Code (KUHP), criminalizes acts that deliberately end the life of another person, including assisted suicide (Kusuma & Khoiroh, 2024). This prohibition is supported by the perspective of Islam which dominates the legal system in Indonesia, where euthanasia is considered contrary to the principles of sharia maqashid, especially the maintenance of the soul (hifz an-nafs). In the Middle East, a similar prohibition applies, with the addition of sharia law provisions that affirm that life is a gift from Allah SWT that should not be taken except in the context permitted by sharia, such as qisas law.

These differences in legal approaches reflect the social, cultural, and religious values that prevail in each jurisdiction. In countries that legalize euthanasia, such as the Netherlands and Belgium, the main focus is on respect for the right of individuals to determine their own end of life. In the context of inheritance, individuals who choose euthanasia or receive medical assistance for suicide still have the right to distribute their assets according to the final will through a will. Inheritance rights in this context are governed by civil law, which does not view the act of euthanasia as an infringement that invalidate inheritance claims.

On the other hand, countries that ban euthanasia, such as Indonesia, adopt a much more restrictive legal approach. In the Islamic inheritance law regulated in Indonesia, an individual's inheritance rights can be revoked if their actions are deemed to violate sharia, such as involvement in the murder of heirs. In this context, although the Indonesian Criminal Code has not explicitly regulated the relationship between euthanasia and inheritance rights, the general principles of criminal and sharia law indicate that a person's involvement in an act that is considered unlawful may affect the legitimacy of their inheritance claim.

These differences also create regulatory gaps in countries that do not yet have explicit rules on euthanasia and inheritance. In Indonesia, for example, legal uncertainty regarding the status of heirs or heirs in euthanasia cases can give rise to legal conflicts, especially when individuals involved in these actions face moral and legal dilemmas (Harisy, 2018; Jaafar, 2023). In cases where an heir undergoes euthanasia illegally, the heirs may face difficulties in claiming their inheritance rights, especially if the act raises ethical debates in court.

Furthermore, in countries with sharia-based legal systems, such as the Middle East, the prohibition of euthanasia not only affects aspects of criminal law but also has consequences for the inheritance rights of the individuals involved. For example, in Islamic law, an heir who is directly involved in the death of another heir, either through an active or passive act of euthanasia, can be considered to have lost their inheritance rights. This is based on the principle that a person should not benefit from his or her actions that violate the law or ethics, in accordance with the fiqhiyah rule, "Benefits should not be taken from sinful acts."

In a global context, this comparison shows that inheritance law related to euthanasia is highly dependent on each country's legal approach to this action. In countries such as Canada and the Netherlands, individuals undergoing euthanasia still have the right to determine the distribution of their assets through applicable legal mechanisms. In contrast, in countries such as Indonesia and the majority of the Middle East, bans on euthanasia create significant legal consequences, including

the potential for annulment of inheritance rights for the individuals involved (Chekhovska et al., 2019; Marijnissen et al., 2022).

In Indonesia, the need for clearer regulations on the relationship between euthanasia and inheritance law is becoming more urgent. This ambiguity creates loopholes that can give rise to different interpretations of the law, especially when the act of euthanasia is carried out by individuals who have no other choice due to extreme medical suffering. Although Indonesian law has not yet provided specifically on the implications of euthanasia on inheritance rights, the principles of criminal and sharia law provide the basis for evaluating inheritance claims in such cases.

As a country with a Muslim majority, Indonesia can consider the principles of maqashid sharia in drafting regulations related to euthanasia and inheritance. This approach can include an assessment of intentions, medical conditions, and legal evidence in determining the status of the heirs or heirs involved. In addition, the establishment of regulations based on justice and human values can help address the ethical dilemmas that arise in these cases.

In a practical context, courts in Indonesia also need to be given clear guidelines for handling inheritance disputes involving euthanasia. This can include developing a legal framework that allows courts to evaluate inheritance claims based on medical conditions, written consent, and ethical considerations. Thus, Indonesia can create a legal system that is more responsive to contemporary issues such as euthanasia, while still respecting the religious and cultural values that underlie its legal system.

### **The Influence of Consent and Legal Evidence in Inheritance Claims**

Written consent and medical evidence are crucial elements in determining the validity of euthanasia actions and their implications for inheritance claims. In countries that legalize euthanasia, such as the Netherlands, Belgium, and Canada, legal regulations are designed to ensure that these actions are carried out legally and transparently. The existence of legal documents, such as the patient's written consent and complete medical records, is the basis for proving that the action was carried out on the basis of conscious and unforced consent.

In the context of euthanasia in the Netherlands, regulates in detail how the patient's consent must be given. This consent must be in the form of a written document confirming that the patient understands the consequences of his or her actions and gives consent voluntarily, without pressure from any party (Van Veen et al., 2022). This document not only protects the patient's right to determine their own end of life but also provides a legal basis for doctors to perform euthanasia procedures without the risk of criminal prosecution.

This proof of consent becomes very important in the context of inheritance. For example, if a patient gives written consent for euthanasia, the document can be used to prove that the act was carried out legally, thus not invoking the patient's right to distribute his or her inheritance. In addition, the written consent also protects the heirs from accusations that they are forcing the heirs to perform euthanasia for financial gain (Lemmens, 2018).

In addition to written consent, medical records also play an important role in supporting the legality of euthanasia actions. The patient's medical record should include a clear diagnosis, prognosis of the medical condition, as well as recommendations from the doctors involved. In the Netherlands, for example, the law requires doctors to consult with at least one other independent doctor before performing a euthanasia procedure (Van Veen et al., 2022). This consultation ensures that all actions taken are in accordance with legal regulations and are not based on subjective considerations.

This medical record is also an important tool in the inheritance claim process, especially if there is a dispute between the heirs. With a complete medical record, the court can assess whether the euthanasia act was carried out in accordance with applicable law, so that inheritance claims can still be filed by the heirs without legal obstacles.

The absence of written consent or medical records can have serious consequences, especially in countries that do not yet have clear regulations regarding euthanasia. In Indonesia, for example, the absence of legal documentation supporting the act of euthanasia can cause the legal status of heirs or heirs to be ambiguous. In cases where the act of euthanasia was carried out illegally or without written consent, the heirs may lose their right to claim the inheritance, especially if the court considers that the act is unlawful.

This legal ambiguity creates a risk of conflict among the heirs, especially if there are allegations that one of the heirs was involved in an act that led to the death of the heir. In situations like these, the Indonesian legal system, which combines criminal, customary, and sharia elements, can provide different interpretations depending on the case. For example, heirs who are proven to have coerced or influenced the heirs to perform euthanasia can lose their inheritance rights based on the principle that one should not take advantage of unlawful actions (Horton & Weisbord, 2021).

This situation shows the importance of developing more specific regulations related to euthanasia and its implications for inheritance rights in countries such as Indonesia. The regulation should include legal documentation requirements, such as written consent and medical records, that can be used to prove the legality of the euthanasia act. In addition, these regulations should provide clear guidelines on how the status of heirs or heirs is determined in cases involving euthanasia.

From an ethical point of view, written consent and medical evidence show respect for the patient's autonomy while ensuring that the act of euthanasia is carried out in accordance with applicable legal and moral standards. Legally, the existence of this document provides legal certainty for all parties involved, including heirs. On the contrary, the absence of legal evidence creates a risk of abuse and conflict that can damage the integrity of the inheritance legal system.

### **Islamic Law Perspectives on Inheritance Rights in Euthanasia**

In Islamic law, euthanasia is often considered an act that violates sharia, and the consequences can have an impact on the inheritance rights of the individuals involved (Zaelani, 2008). The main principle used in assessing this case is *maqashid sharia*, especially the maintenance of the soul (*hifz an-nafs*). In this framework, human life is seen as a gift from Allah SWT that must be guarded with full respect. Any action aimed at intentionally ending life, such as active euthanasia, is generally considered contrary to this principle (Harisy, 2018). As a result, individuals who are directly or indirectly involved in the act of euthanasia may lose their inheritance rights, especially if the act is considered a violation of sharia.

In the case of inheritance law, the rules of *fiqhiyah* are also a guide. This rule states that a person should not benefit from actions that are contrary to Islamic law or ethics. Thus, heirs or heirs who are involved in euthanasia can lose their inheritance rights based on the principle that one should not take advantage of sinful deeds. This view is not only valid in traditional Islamic law but is also adopted in the legal system in some Muslim countries.

The debate among scholars regarding passive euthanasia provides an additional dimension to the understanding of this case. Passive euthanasia, which usually involves stopping medication or medical aids that are ineffective to prolong a patient's life, is often seen as more complex than active euthanasia. Some scholars, such as Yusuf Al-Qaradawi, argue that under certain conditions, stopping treatment that has no medical benefit is acceptable in Islam, provided there is no immediate intention to end the patient's life (Jaafar, 2023). This approach is based on the principle that everything must be done to reduce suffering, while maintaining respect for life.

However, this opinion is not fully accepted by all scholars. Some conservative clerics reject all forms of euthanasia, including passive euthanasia, arguing that it still has the potential to violate *the principle of hiḥḍ an-nafs*. In this view, even if the action does not directly cause death, the cessation of treatment is still considered contrary to the human obligation to try to preserve the life that has been given by Allah SWT (Harisy, 2018). This difference of views creates space for *ijtihad* in determining whether individuals involved in passive euthanasia still have inheritance rights or not.

The principle of *maslahah mursalah*, or public interest, can be an important tool in assessing euthanasia cases in the context of Islamic inheritance law. *Maslahah mursalah* allows flexibility in the application of Islamic law to achieve greater goals, such as justice and the reduction of suffering. In the case of passive euthanasia, this principle can be used to consider the inheritance rights of individuals, especially if the action is carried out to reduce the suffering of the patient who cannot be cured.

For example, in a situation where the heirs give consent to the cessation of treatment in order to alleviate their suffering, the principle of *maslahah mursalah* can be used to evaluate whether the action is worth invoking the heirs' rights involved. If the primary intention of the act is to alleviate suffering and not to take advantage of the death of the heir, then the right of inheritance may still be recognizable. This approach shows that Islamic law has the flexibility to handle complex cases such as euthanasia, without having to completely deny the rights of the individuals involved.

In many Muslim countries, the approach to euthanasia and its implications for inheritance are heavily influenced by local interpretations of sharia. In countries such as Saudi Arabia and Iran, which implement sharia as the basis of state law, active euthanasia is considered an illegal act that can have serious consequences for all parties involved. In the context of inheritance, heirs who engage in active euthanasia almost certainly lose their rights, as such actions are considered a serious violation of Islamic law.

In contrast, in countries such as Malaysia and Indonesia, where Islamic law interacts with civil law, approaches to euthanasia and inheritance tend to be more moderate. In Indonesia, for example, although euthanasia is considered illegal under criminal and sharia law, courts often consider the intention and legal evidence in determining the status of the heirs. This approach reflects the need for a balance between the application of sharia principles and respect for the broader local context.

The implications of euthanasia on inheritance rights in Islamic law are not only related to the act itself but also the intention and conditions under which the act is carried out. In cases of passive euthanasia, for example, the court may consider whether the action was carried out at the request of the patient and whether the act aims to alleviate suffering without violating the basic principles of sharia. In this context, the principles of justice (*'adl*) and balance (*mizān*) are important guidelines in determining whether individuals involved in euthanasia retain their inheritance rights.

However, in the case of active euthanasia, especially if it is carried out without the patient's consent, the inheritance rights are almost certainly canceled. This approach is based on the view that such actions not only violate sharia principles but also create injustice for other heirs. Thus, Islamic law provides clear but flexible guidance in handling cases of euthanasia and its implications for inheritance rights, depending on the context and intent of the action.

### **Ethical and Moral Implications for Legal Decisions**

The public's perspective on euthanasia plays an important role in influencing legal decisions about inheritance claims. The difference in views between societies in Western countries and countries with strong religious values reflects differences in ethical, moral, and cultural norms. In Western countries such as the Netherlands and Canada, legal decisions are often based on the principle of individual autonomy, where a person's right to determine the end of his or her life is

considered part of human rights. In this context, the act of euthanasia is not always considered a violation of law or ethics, so inheritance claims by individuals involved in euthanasia tend to be more acceptable.

On the other hand, in countries with strong religious values, such as Indonesia and Saudi Arabia, people's views on euthanasia tend to be more conservative. Religious and moral norms that prioritize the sanctity of life often dominate public discourse, so the act of euthanasia is considered contrary to fundamental values. As a result, the laws in these countries are more likely to reject inheritance claims from individuals involved in euthanasia, as such actions are seen as serious violations of moral and ethical principles.

Moral and ethical norms have a significant influence on the application of inheritance law in the context of euthanasia. In Western countries, where ethical norms are often secular, legal decisions tend to be more pragmatic and based on utilitarian principles (Chekhovska et al., 2019). In the context of inheritance, this means that inheritance claims by individuals involved in euthanasia are not necessarily denied, provided that the action is carried out in accordance with legal procedures and patient consent (Robertson, 2019). This approach reflects the view that respect for individual decisions is more important than maintaining moral norms that are collective. However, in countries with strong religious values, moral and ethical norms are more often based on religious teachings that emphasize the sanctity of life. In Islam, for example, the act of euthanasia is seen as a violation of the will of Allah SWT, so individuals involved in this act often lose their right to inherit. This norm is applied not only to maintain the integrity of sharia law but also to strengthen social values that respect life as a divine gift (Zaelani, 2008). Thus, inheritance law in these countries reflects more of a commitment to collective moral values than individual autonomy.

Legal decisions about inheritance claims by individuals involved in euthanasia have far-reaching social impacts. In Western countries, recognition of inheritance claims in the context of euthanasia can signal that society respects the individual's right to determine the end of his or her life. However, this recognition could also spark an ethical debate, especially among conservative groups who fear that this measure could promote the normalization of euthanasia as a medical solution. In the long term, this can affect social dynamics, such as increasing acceptance of euthanasia among the younger generation. In contrast, in countries with strong religious values, rejection of inheritance claims by individuals involved in euthanasia is often seen as an attempt to maintain traditional moral norms (Rudnev & Savelkaeva, 2018). However, this refusal can also create conflicts among the heirs, especially if there are differences of opinion about the act of euthanasia itself. In Indonesia, for example, cases where an heir chooses euthanasia voluntarily can pose an ethical dilemma for families who must decide whether they will support the action or defend their inheritance rights. These conflicts not only affect family relationships but also create tensions in the wider society.

Case studies from the Netherlands and Canada show how different ethical norms can influence legal decisions about inheritance claims in the context of euthanasia. In the Netherlands, the law recognizes the right of individuals to determine the end of their lives, and euthanasia actions carried out in accordance with the law do not affect inheritance claims. This reflects the values of Dutch society that respect individual autonomy and prioritize the reduction of human suffering (Emanuel et al., 2016; Marijnissen et al., 2022). In contrast, in countries with strong religious values such as Indonesia, the act of euthanasia is often seen as a grave sin that affects not only individuals but also their communities (Baharudin, 2020). In the context of inheritance, this view translates into legal decisions that reject inheritance claims from individuals involved in euthanasia. This view reflects a commitment to religious and moral values that emphasize the importance of maintaining social harmony.

While there are significant differences between Western countries and countries with strong religious values, both approaches face challenges in balancing ethical values with legal decisions. In Western countries, recognition of inheritance claims in the context of euthanasia is often seen as a step forward in respecting individual rights. However, this approach can face criticism because it is perceived as ignoring greater moral values. In countries with strong religious values, rejection of inheritance claims can reinforce moral norms but can also create injustice for individuals acting on difficult decisions. In this context, the principle of justice becomes important to ensure that legal decisions not only reflect moral values but also respect the rights of individuals. Thus, the development of an inclusive legal framework is an important step to handle this issue fairly and ethically (Harisy, 2018; Lemmens, 2018).

Moral and ethical norms play a very important role in influencing legal decisions about inheritance claims in the context of euthanasia. While there are significant differences between Western countries and countries with strong religious values, both approaches reflect an effort to balance ethical values with legal needs. In a global context, recognition of these differences can help create a better understanding of how moral and ethical norms can influence complex legal decisions.

#### 4. CONCLUSION

This study explores the relationship between the act of euthanasia and its implications for inheritance law, both in the context of Islamic law and global jurisdiction. From the perspective of Islamic law, the principle of *maqashid sharia*, especially *hifz an-nafs* (the preservation of the soul), emphasizes that the act of euthanasia is contrary to sharia values because it involves the intentional termination of life. However, the *maslahah mursalah* (public interest) approach opens up space to consider certain conditions, especially in the case of passive euthanasia aimed at reducing the patient's suffering without violating the fundamental principles of Islam. In this context, Islamic law shows flexibility in dealing with complex issues such as euthanasia, while still considering the values of justice and humanity. On the other hand, legal documentation such as written consent and medical records are important elements in proving the validity of the euthanasia act and its relation to the inheritance claim. The absence of legal evidence creates regulatory loopholes in countries that prohibit euthanasia, including Indonesia, which relies on religious moral principles as the legal basis.

At the global level, different approaches to euthanasia reflect the social norms and ethical values of each country. In Western countries such as the Netherlands and Canada, inheritance claims are still recognized if the act of euthanasia is carried out in accordance with legal procedures, reflecting respect for the individual's right to determine the end of his or her life. In contrast, countries with strong religious values, such as Indonesia and Saudi Arabia, tend to reject inheritance claims by individuals involved in euthanasia, as such actions are considered contrary to religious and social norms. This research emphasizes the importance of clearer regulations to address legal gaps related to euthanasia and inheritance rights, by balancing legal, ethical, and humanitarian values. With this contribution, this research can be the basis for the development of more comprehensive policies and regulations, both in Indonesia and at the international level.

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