
THE ROLE OF RELIGIOUS INSTITUTIONS IN SHAPING LEGAL DISCOURSE ON EUTHANASIA IN INDIA: BALANCING INDIVIDUAL RIGHTS AND MORAL VALUES IN A SECULAR FRAMEWORK

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ABSTRACT

Euthanasia originates from the Greek words, EU which means good and Thanatos which means death. It is the intentional ending of a life where people are suffering from such a disease that there is no scope for recovery. This paper will analyze the interplay between religious ideals and the legal framework in India and also the conflict between individual autonomy, religious values and constitutional principles. Initially, it will explore the historical development of Euthanasia over time highlighting its evolving ethical and cultural dimensions.

The paper will further define the types of euthanasia- weighing the merits such as respecting personal autonomy against its demerits including ethical concerns. We will then delve into the comparative analysis of global and Indian religious perspectives on euthanasia, elaborating on the various religions which are there in India and their perspective on euthanasia.

The Indian jurisprudence has progressively dealt with euthanasia which is evident from landmark cases like *Gian Kaur v. State of Punjab* (1996), *Aruna Shanbaug* (2011), and *Common Cause v. Union of India* (2018), which legalised passive euthanasia under strict conditions. These rulings showcase how the judiciary has tried to balance secular ideas with religious beliefs.

The paper concludes by emphasizing the importance of discourse and dialogue between religious leaders and legal entities to balance secular principles with religious ideals. India's legal evolution on euthanasia reflects its efforts to respect individual dignity and personal autonomy while addressing ethical, religious, and societal concerns.

INTRODUCTION:

Euthanasia originates from a Greek word, “EU” which means good and “Thanatos” which means death. Euthanasia refers to the intentional killing of a terminally ill patient who has been suffering from severe pain and there is no scope of recovery left according to the present medical science. It encompasses different methods of administering death, like giving a lethal injection or withdrawing life-supporting medical care.

Euthanasia as a practice is universally contentious and has different levels of acceptance worldwide. This paper will explore how various religious institutions in India influence the legal debates on euthanasia and how India has been trying to strike a balance between individual autonomy, religious sentiments, and constitutional principles.

HISTORICAL EVOLUTION OF EUTHANASIA:

The concept of euthanasia has undergone various significant changes over the centuries. In ancient civilizations, like Sparta, children who were deemed unworthy of life were put down at birth.

Plato in his work, “The Republic” introduced euthanasia as a concept through the teachings of Asclepius, the god of healing, who advocated that doctors can forgo treatments of patients when it is unsuccessful.¹

Euthanasia is also part of a dark history of the human race where under the Nazi euthanasia program which was initiated in 1939, it was a state-sponsored killing of individuals including children who were seen as burdens and unworthy of life. Tragically, this program’s method was a rehearsal for the later mass executions of Jews through gas chambers.²

Therefore, we can see that the idea of euthanasia has evolved from an early philosophical understanding to its tragic application under the Nazi regime, showcasing the changing perceptions of life and death and giving rise to the ethical use of this practice.

¹ J.D. Papadimitriou, P. Skiadas, C.S. Mavrantonis, V. Polimeropoulos, D.J. Papadimitriou & K.J. Papacostas, *Euthanasia and Suicide in Antiquity: Viewpoint of the Dramatists and Philosophers*, 100 J. Royal Soc'y Med. 25 (2007).

² United States Holocaust Memorial Museum, *Euthanasia Program*, <https://encyclopedia.ushmm.org/content/en/article/euthanasia-program> (last visited Nov. 10, 2024).

TYPES OF EUTHANASIA:

Euthanasia is primarily divided into active and passive euthanasia. Active euthanasia includes the killing of terminally ill patients through active means like injecting lethal drugs. Passive euthanasia on the other hand is letting the patient die naturally by withdrawing artificial life support systems like ventilators. Further, euthanasia is divided into voluntary and involuntary euthanasia where the former refers to the killing of the patient by obtaining his or her consent and involuntarily euthanasia means without the consent of the patient, for instance, a patient who has been in a coma for a long period.

DEMERITS AND MERITS OF EUTHANASIA:

The arguments which are against euthanasia include the following:

1. Moral and ethical concerns: The intentional killing of a patient will undermine the fundamental value of human life. It can also affect societal attitudes towards the disabled, elderly, or terminally ill.
2. Potential for abuse: legalising euthanasia can lead to misuse of both voluntary and non-voluntary euthanasia, where vulnerable populations may feel pressured to end one's life.
3. Impact on medical professionals: There can be a shift in the perception of healthcare providers from being healers to life-terminating facilitators. It can also come in conflict with their religious value which might contradict the legalising euthanasia.

The arguments which favour euthanasia are the following³:

1. Euthanasia honours the personal autonomy of people who want to die a dignified death.
2. It minimises the financial burden on families and is expensive to keep people alive when there is no cure for the illness.
3. Friends and family would not have to endure the agony of witnessing a loved one die a protracted death. For instance, After reviewing Aruna's case, a qualified court concluded

³ BBC Bitesize, *Arguments for Euthanasia*, <https://www.bbc.co.uk/bitesize/guides/zhbqf4j/revision/8#:~:text=Arguments%20for%20euthanasia&ext=Euthanasia%20enables%20a%20person%20to,no%20cure%20for%20their%20illness> (last visited Oct. 17, 2024).

that "the doctors are not actively killing anyone; they are merely refraining from saving her."

The demerits of euthanasia explicitly outline how the major religions of the world is against the use of passive or active euthanasia. But there are many instances where we see people from different faiths who are accelerating death to onboard with their spiritual journey. For instance sallekhana, in jainism.

RELIGIOUS IMPACT ON THE GLOBAL LEGAL FRAMEWORK OF EUTHANASIA:

Legislation around the world surrounding euthanasia and physician-assisted suicide is shaped by the blend of religious values, secular principles and other legal considerations, especially in countries like Belgium, Netherlands and Switzerland where euthanasia and physician-assisted suicide are legal. These nations have significant Christian populations, a large part of the population also identify themselves as secular or unaffiliated with any religion. For instance, in Belgium, where 64% of the population identifies as Christian, about 29% of people are religiously unaffiliated. In the Netherlands, where euthanasia is legal but under strict conditions, reflects a coexistence of Christian traditions and values with secular principles.

In contrast, we see countries like Columbia which have a high level of religious adherence, where 92% of the population identifies as Christians and 77% regard religion as very important, have faced significant challenges in legalising euthanasia due to strong religious opposition. In countries where Christianity coexists with a substantial secular population, a decisive balance is established between upholding religious traditions and advancing progressive approaches to end-of-life care.⁴

LEGAL FRAMEWORK SURROUNDING EUTHANASIA IN INDIA:

The legal framework governing euthanasia has evolved in India through various landmark judgements, reflecting a nuanced balance between religious, and ethical beliefs, individual

⁴ G. Grove, M. Lovell & M. Best, *Perspectives of Major World Religions Regarding Euthanasia and Assisted Suicide: A Comparative Analysis*, 61 J. Religion & Health 4758 (2022), <https://doi.org/10.1007/s10943-022-01498-5> (last visited Oct. 20, 2024).

autonomy and secular values.

1. Early judicial stance: In *Gian Kaur v. State of Punjab* (1996)⁵, the honourable Supreme Court of India addressed the constitutionality of section 309 of the Indian Penal Code, which criminalised attempted suicide. The court upheld the validity of the “right to life” under Article 21 of the Indian constitution and observed that this does not include the “right to die”. This judgement set a precedent that neither suicide nor euthanasia was permissible under Indian law.
2. Arun Shanbaug case (2011)⁶: Aruna Shanbaug, a nurse who had been in a persistent vegetative state for over three decades, became the centre of a legal battle regarding passive euthanasia. The Supreme Court, while rejecting the request for active euthanasia, recognised the legality of passive euthanasia under strict guidelines. The Court permitted the withdrawal of life-sustaining treatment for patients in a permanent vegetative state, provided that the decision was made by close relatives or “next friends” and approved by the High Court. This judgment marked the first legal acknowledgement of passive euthanasia in India.

Pinki Virani⁷ in her book, *Aruna’s Story* pens down, “Aruna Shanbaug is not blessed. She is partially brain-dead. She is blind. She cannot speak. She has atrophying bones, and wasting muscles. The joints at her fingers, her wrists, her knees, and her ankles are bending inwards. To try and straighten them is to cause her pain. She feels pain, this part of her brain is a sly survivor, and it continues to be healthily alive. She gets her periods, these are excruciatingly painful periods.”

3. *Common Cause v. Union of India* (2018)⁸: In the landmark case of *Common Cause v. Union of India* (2018), the Supreme Court observed the "right to die with dignity" as an important aspect of the "right to life" under Article 21. This landmark judgment legalised passive euthanasia and empowered individuals to create "living wills" for their end-of-life medical care.

⁵ *Gian Kaur v. State of Punjab*, (1996) 2 S.C.C. 648.

⁶ *Aruna Ramachandra Shanbaug v. Union of India & Ors.*, (2011) 4 S.C.C. 454.

⁷ Pinki Virani, *Aruna's Story* 194 (Penguin Books India)

⁸ *Common Cause (A Regd. Society) v. Union of India & Ors.*, (2018) 5 S.C.C. 1.

The Current Legal Position of euthanasia in India: active euthanasia remains illegal in India, and passive euthanasia is permitted under strict conditions, such as possessing a valid approval from a medical board and the jurisdictional High Court. These developments exemplify India's cautious yet progressive stance on euthanasia, effectively balancing ethical considerations with respect for individual rights and dignity.

COMPARATIVE RELIGIOUS PERSPECTIVE ON EUTHANASIA:

India is a land of myriad religious values and sentiments. In the following section, we will delve into the various perspectives of different religions on euthanasia which will ultimately influence the legal position of euthanasia in India.

Hinduism

Hindu Philosophy argues that the cycle of life is governed by karma and dharma, where suffering is seen as a way of spiritual purification. Euthanasia, especially active euthanasia is seen as a disruption to this cycle which would invite negative karmic consequences.⁹ However, passive euthanasia somewhat aligns with Hinduism and its principles of non-violence and detachment, where an act allowing the natural course of life and death will unfold, and is free from any kind of attachment or unnecessary intervention. Therefore, this can be seen as giving preference to individual autonomy and dignity and trying to minimise suffering while upholding the principles of ahimsa. Hinduism acknowledges enlightened individuals who consciously choose death as a path of spiritual journey. An instance can be traced in the Mahabharata, where the Pandavas undertook the Mahaprasthanika (the "great journey"), willingly relinquishing their bodies during a pilgrimage in the Himalayas.¹⁰

Islam

Islam outrightly rejects euthanasia because it is grounded in the belief that life and death are in the hands of God and not humans. The Quran emphasises the sanctity of life and various Islamic jurisprudence relentlessly categorised euthanasia as haram(forbidden).¹¹ In the

⁹ Namita Nimbalkar, *Euthanasia: The Hindu Perspective*, National Seminar on Bioethics (2007).

¹⁰ *The Mahabharata*, Book 17: *Mahaprasthanika Parva*, trans. Kisari Mohan Ganguli (1883–1896).

¹¹ Graham Grove, Melanie Lovell & Megan Best, *Perspectives of Major World Religions Regarding Euthanasia and Assisted Suicide: A Comparative Analysis*, 61 *J. Religion & Health* 344, 344–59 (2022).

Qur'an, it is stated, "My slave hurried to bring death upon himself, so I have forbidden him to enter Paradise" (Qur'an 4:29)

Buddhism

Buddhism takes a thoughtful approach to euthanasia, focusing on the intention and mental state at the time of death. While different traditions may have varied views, Buddhism usually opposes active euthanasia. This is because taking a life—whether one's own or someone else's—goes against the First Precept of non-harm. However, some Buddhists recognise the compassionate reasons for euthanasia, especially to relieve suffering. In certain situations, passive forms of euthanasia may be acceptable if they aim to minimise harm without attachment or aversion.¹²

Jainism

Jainism, one of the ancient religions of India, offers a thoughtful perspective on euthanasia that encourages dialogue around ethical considerations.¹³ At the core of Jain's beliefs is ahimsa, or non-violence, which views all forms of killing, including euthanasia, as unacceptable.

However, Jainism also acknowledges the practice of 'Sallekhana' or 'Santhara.' This spiritually significant act allows individuals facing terminal illnesses or advanced age to peacefully fast to death, emphasising themes of detachment and purification. The complexities surrounding

'Santhara' have led to important discussions and legal evaluations. In 2015, the Rajasthan High Court deemed 'Santhara' illegal under Section 309 of the Indian Penal Code (IPC), a decision that sparked significant debate. Yet, the Supreme Court of India subsequently issued a stay on this ruling, fostering ongoing conversations about how legal frameworks intersect with religious practices.

¹² Ibid, 344-52

¹³ N. Sharma, *Euthanasia and Religion in India: The Jain Perspective*, 11 J. Religious & Pol. Prac. 122 (2019), <https://www.tandfonline.com/doi/abs/10.1080/19472498.2019.1609261> (last visited Nov. 2, 2024).

Sikhism

Sikhism, a monotheistic religion regards life as a precious gift from God and generally opposes euthanasia. The teachings of Sikhism encourage resilience, thereby seeing suffering as an important part of life.¹⁴ The Guru Granth Sahib emphasises accepting God's will (Hukam) and views challenges and suffering as opportunities for spiritual growth. "Whatever happens, it all happens according to Your Will."¹⁵

Countries like the Netherlands and Belgium, which permit both active and passive euthanasia under strict conditions, can be seen as prioritizing personal autonomy and dignity. Similarly, Switzerland has permitted physician-assisted suicide provided that it is backed by mental health evaluations to ensure free and informed consent. While India, through its judgments, has cautiously allowed passive euthanasia under stringent conditions, it has yet to delve into the complex issue of active euthanasia. Compared to countries with a single dominant religion, India's approach appears overtly restrictive, reflecting its need to balance a diverse range of religious and cultural perspectives.

SECULAR PRINCIPLES VS. RELIGIOUS INFLUENCE ON EUTHANASIA:

In the milestone judgement of *Common Cause V. Union of India* 2018, the honourable Supreme Court observed that the right to die with dignity is a fundamental right under Article 21 of the Indian Constitution. The court also issued guidelines to facilitate the practice of passive euthanasia including making of living will. This ruling can be seen as an extension of the precedent given under the *Gian Kaur* case and the *Aruna Shanbagh* case. It has been a judicial concern for terminally ill patients to die with dignity given the absence of a formal right and the debilitating condition of our public health system. According to the Economist Intelligence Unit, India ranked 67th out of 80 countries in their quality of death index¹⁶.

The *Common Cause* (2018)¹⁷ case brought attention to a sensitive issue: when considering

¹⁴ H. Singh, *End of Life Decisions: A Perspective from Sikhism* (2021), ResearchGate, https://www.researchgate.net/publication/348523701_End_of_Life_Decisions_A_Perspective_From_Sikhism (last visited Oct. 25, 2024).

¹⁵ *Guru Granth Sahib*, Ang 193, <https://www.sikhithemax.org/ang?ang=193> (last visited 7th.November, 2024)].

¹⁶ The Economist Intelligence Unit, *2015 Quality of Death Index*, The Economist (2015), <https://impact.economist.com/perspectives/health/2015-quality-death-index> (last visited Nov. 15, 2024).

¹⁷ *Common Cause (A Regd. Society) v. Union of India & Ors.*, (2018) 5 S.C.C. 1.

passive euthanasia as a palliative option, the "best interest of the patient" should take precedence over state interests. This ruling emphasizes the dignity and well-being of individuals facing suffering without hope of recovery. It emphasises the importance of individual autonomy and compassionate care, highlighting that the right to die with dignity is an essential part of the right to life, as outlined in Article 21 of the Constitution. In another landmark judgement, *K.S. Puttaswamy*¹⁸, Justice Chelameshwar expressed concern regarding the state's practice of forcing individuals to be fed against their will, highlighting the profound privacy issues it raises. It is essential to recognise that each person's right to refuse life-prolonging medical treatment or to make decisions about ending their life is a deeply personal matter that falls within the realm of privacy. These choices are fundamental to personal dignity and autonomy, and they deserve our compassion and understanding.

Therefore, India's judiciary balances secular values and religious beliefs in euthanasia cases. In *Common Cause v. Union of India* 2018, passive euthanasia was legalised, giving more importance to individual autonomy over religious concerns. Conversely, in the *Gian Kaur* case of 1996, the court had given more weightage to religious values thereby emphasising life's sanctity. The *Santhara* case of 2015, again brought in religious tensions between legal principles and religious values.

For instance, in the case of *Harish Rana v. Union of India & Ors.*, The Delhi High Court considered a petition from Harish's parents who have been in a vegetative state since 2013.

They sought passive euthanasia through the removal of his feeding tube. The court referred to *Arun Shanaug* and the common case and clarified that Ryles tube or feeding tube does not come under the definition of life support and therefore did not meet the legal criteria for passive euthanasia. Despite the court's sympathy for the parents, it had to reject their plea, emphasising the need to uphold legal boundaries in sensitive cases.¹⁹

The outright prohibition of active euthanasia in India comes from the fact that it comes in direct conflict with the core principles of religious institutions present in India. Any judicial or legislative support of active euthanasia will risk outraging significant sections of the Indian

¹⁸ *Justice K.S. Puttaswamy (Retd.) v. Union of India*, (2017) 10 S.C.C. 1, https://main.sci.gov.in/supremecourt/2012/35071/35071_2012_Judgement_24-Aug-2017.pdf (last visited Nov. 20, 2024).

¹⁹ *Harish Rana v. Union of India & Ors.*, (2024) SCC OnLine Del 4927, https://www.livelaw.in/pdf_upload/smp02072024cw49272024164044-548336.pdf (last visited Nov. 22, 2024).

society thereby undermining the moral fabric of our society. Archbishop Raphy Manjaly of Agra, chairman of the doctrinal commission of the Catholic Bishops' Conference of India, for example, praised the court's firm stance, saying, "We are extremely happy that the sacredness of life has been upheld by the court."²⁰ This is one example of how Catholic churches in India expressed their approval of the Supreme Court's decision to forbid passive euthanasia.

The landmark judgment, *Common Cause v. Union of India* (2018) is progressive but it still failed to address the broader issue of active euthanasia. The dependency on living wills may exclude individuals who were not able to articulate their wishes in advance due to unforeseen circumstances. Unlike other countries, India's reluctance to address the issue of active euthanasia showcases its considerations for the religious sentiments thereby limiting progressive reforms in the area of active euthanasia.

Passive euthanasia has been able to find some ground in the legal area of our nation because it can respect both individual's rights or autonomy and broader religious beliefs. The judiciary has played a significant role in bridging the gap between individual rights and religious beliefs, maintaining respect the constitutional principles. Passive euthanasia for instance reflects a more compassionate approach which can be seen as aligning with the principles of ahimsa or non-violence in Hinduism, Jainism, and Buddhism. By opting out of aggressive medical treatments, it seeks to honour the wishes and rights of individuals thereby allowing them to be free from prolonged suffering and dying with dignity.

RECOMMENDATIONS:

The Law Commission on India has outlined some recommendations in its 196th report titled 'Medical Treatment to Terminally Ill Patients (Protection of Patients and Medical Practitioners)', where it has reemphasised the fact that active euthanasia and assisted suicide should remain unlawful. Further, it has been observed that a patient who is competent and conscious about his illness and changes of no recovery should be allowed to refuse medical treatment, and this decision should become binding on medical practitioners. For the patients who are unable to make informed decisions (long vegetative state, minors, people in a coma, those unsound minds, or those who are incapacitated,) the commission recommends that the

²⁰ Vatican News, *Church Leaders Welcome India Supreme Court Euthanasia Ban*, Vatican News (Aug. 2024), <https://www.vaticannews.va/en/world/news/2024-08/church-leaders-welcome-india-supreme-court-euthanasia-ban.html> (last visited Oct. 29, 2024).

medical practitioners along with other medical experts may decide the case keeping in mind the patient's best interest. The commission asserts that legal safeguards are necessary for medical practitioners who make decisions on patient's informed consent or expert medical opinions for incompetent patients. These legal experts will shield these medical practitioners from any criminal liability when they withdraw life support in good faith.²¹

Indian legislation and the judiciary should collaborate to promote public awareness regarding the destigmatisation of passive euthanasia, particularly emphasising the significance of individual autonomy. In addition, it is essential to engage formally and extensively with various religious institutions and leaders to facilitate dialogue on bridging the gap between secular values and religious perspectives concerning euthanasia.

CONCLUSION:

Indian secularism has been a torchbearer for recognising the importance of religious beliefs and personal laws that encompass individual faith. These personal laws have played an important role in areas like marriage, divorce, inheritance and balancing the values and doctrines of different religions. The Indian Courts have always understood and tried to maintain this delicate balance between religious values and constitutional principles. India has a rich religious tapestry with myriad religious values that often come in conflict with legal principles. Law, as we know, is ever-evolving, it is dynamic and therefore we see how chronologically, the Indian judiciary has over time tried to bring a balance between secular principles and religious values concerning euthanasia.

²¹ Law Commission of India, *196th Report on Medical Treatment to Terminally Ill Patients (Protection of Patients and Medical Practitioners)* (2006), <https://cdnbbsr.s3waas.gov.in/s3ca0daec69b5adc880fb464895726dbdf/uploads/2022/08/2022081061-1.pdf> (last visited Nov. 27, 2024).

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