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Dear Scottish Member of Parliament,

Re: Assisted Dying for Terminally Ill Adults (Scotland) Bill 2024 – Serious Critical Clinical Concerns

We write as the professional body representing over 1,400 palliative medicine specialists across Great Britain and Ireland to express our profound and escalating professional concerns regarding the Assisted Dying for Terminally Ill Adults (Scotland) Bill. We are deeply concerned that legislation in its present and now amended form is clinically unsafe, inequitable and unworkable

- **Inadequate Safeguards endanger patients**
Lives are at risk through flawed prognostication, risk of coercion, no mental health assessment, no requirement for suffering, and patients rationale for AD can be feeling a burden or financial pressure,.
- **Protect Palliative Care**
With critical workforce shortages across Scotland, inequitable access to palliative care, predominantly charitably funded services, assisted dying must not become a default option.
- **Equity before expansion**
Every patient deserves equitable access to high-quality palliative care before considering assisted dying - this must be guaranteed first.
- **Removal of Essential Governance Protections**
It is now evident that critical provisions concerning professional regulation and conscientious objection will be omitted from the final Bill ([Here](#)). This means MSPs are being asked to approve legislation without the very safeguards they initially deemed necessary for safe implementation. The decision on these safeguards has been deferred to Westminster. There is now no guarantee that healthcare professionals will have the right to conscientiously object to involvement in AD without penalty, nor is there provision to protect patients from doctors suggesting assisted dying to them unprompted when they meet the eligibility criteria. For our full statement of serious concern see [Here](#).

We urge you to review:

- Serious Clinical Concern regarding removal of essential clinical safeguards Jan 2026 ([Here](#))
- Twenty-one Key Questions for MSPs to consider regarding the Scotland Bill – updated Feb 26 ([Here](#))
- Assisted Dying MythBusters updated Jan 2026 ([Here](#))
- A video by Dr Kath Mannix outlining what happens during ordinary dying ([Here](#))
- The APM Scotland 2022 Assisted Dying Survey ([Here](#))

Our 2022 survey indicates that 75% of Scottish palliative care specialists would be unwilling to participate in the assisted dying process, with 43% indicating they would consider resigning if required to do so. The protection of professional conscience is not a peripheral issue but a cornerstone of ethical medical practice.

In matters of life and death, the threshold for safety must be unassailable. The current proposals fall demonstrably short of this standard, exposing vulnerable people to risks we cannot undo, while the palliative care they need remains inequitable and often unavailable. Until these profound concerns are meaningfully addressed, moving forwards with assisted dying in Scotland would risk normalising irreversible decisions borne from unequal access to care and not genuine choice. We urge extreme caution: dying people need investment in care and support, not legislation that could compound existing inequities.

Sincerely,

Executive of the Association for Palliative Medicine

Dr Suzanne Kite, President
Dr Paul Paes, Vice-President
Dr Natasha Wiggins, Treasurer
Dr Sarah Cox, Past-President
Dr Fiona MacCormick, Scotland APM Representative
Dr Andrew Thorns, APM Ethics and Research Chair
And Dr Matthew Doré, Honorary Secretary