INTERNATIONAL JOURNAL OF RESEARCH AND INNOVATION IN SOCIAL SCIENCE (IJRISS)
ISSN No. 2454-6186 | DOI: 10.47772/IJRISS | Volume X Issue VI June 2026

Safeguarding Consumer Rights: The Case of Bangladesh with Regional Lessons from India and Pakistan

Sohel Chakma

Directorate of National Consumers' Rights Protection, Ministry of Commerce, Bangladesh

DOI: https://doi.org/10.47772/IJRISS.2026.100600275

Received: 24 May 2026; Accepted: 29 May 2026; Published: 22 June 2026

ABSTRACT

This is a common scenario in Bangladesh that consumers often encounter: violations of consumer rights, such as the availability of unsafe & counterfeit products, including essential items like edible oil, spices, baby foods, and fake cosmetics; the selling of date-expired products, even medicine; the mixing of different non-food-grade colors to make the foods more lucrative and attract customers; etc. Most surprisingly, some dishonest traders want to make more profit illegally, and they are directly involved in some gruesome activities that put the lives of consumers at high risk. Additionally, the majority of consumers are unaware of this consumer rights violation, and the illegal traders capitalize on this lack of awareness. The most vulnerable groups are low-income households, women, children, and older adults who have insufficient knowledge about their rights as consumers. This analysis will focus on the protection of consumer rights in Bangladesh, including the institutional framework, legal issues, and their effectiveness, compared with India and Pakistan. Moreover, the principal aim of this study will be to identify best practices that Bangladesh can adopt from comparable countries to implement and strengthen consumer rights protection in the country. The research will be conducted by analyzing the consumer rights protection acts of these countries, the activities of the relevant authorities, and government reports. The outcome of this study will be beneficial for the government of Bangladesh as well as the Directorate of National Consumers' Rights Protection (hereinafter referred to as the DNCRP), the sole government organization authorized for the protection of consumer rights in the country.

Keywords: consumer rights, violation, legal framework, comparative assessment, safeguard, goods/services

INTRODUCTION

In business, customers are considered to be the king. However, in most developing countries, such as Bangladesh, this is not the case; instead, it sometimes seems that businessmen are the king and consumers are the victims in this scenario (Alam & Haq, 2016; see also Mia & Mallick, 2021). According to BDLex (2024), consumer rights have historically been overlooked in Bangladesh. Illegal trades manipulated consumers due to a lack of awareness and a limited legal framework. The establishment of the Consumer Rights Protection Act, 2009 (Hereinafter cited as the CRPA), was a pioneer in protecting consumer rights. Consumer rights protection is tremendously crucial for strengthening a country's economy, as consumers play a pivotal role in the economy. Therefore, there is no other option but to establish the rights of consumers, as they are the principal players in the market (Nawaz & Kanwal, 2020). Consumer rights are always disregarded in Bangladesh. It is a matter of concern that the majority of consumers are unaware of their rights as consumers, despite these rights being considered fundamental to people. Illiteracy is the main issue here. This is a common situation in developing countries, where, over time, consumers are often manipulated by traders due to poverty, a lack of education, and a lack of protest over the violation of consumer rights (Islam et. al., 2016). On the other side, Nawaz & Kanwal (2020) also stated that consumer rights protection is one of the fundamental constitutional rights of the citizens. Article 32 of the Bangladesh Constitution clearly states the basic rights of a citizen, indicating that the consumption of safe goods and services is the fundamental right of every citizen. Therefore, this is an appropriate time to conduct a comprehensive study on this topic, as there have not been sufficient comparative studies conducted.

This study will focus on the current overall condition of consumer rights implementation in Bangladesh, covering the institutional and legal framework and their effectiveness, compared to India and Pakistan. One of the main reasons for choosing India and Pakistan for comparison with Bangladesh is that their historical and socio-economic conditions are similar. In terms of legal systems, all the countries inherited a similar legal system from British colonial rule. So, basically, these countries were part of a single continent during British rule, known as the Indian subcontinent. Although they have become independent countries, there are still many similarities in terms of socio-economic backgrounds, such as large growing populations with substantial consumer markets. Moreover, the challenges are also quite similar, such as food adulteration, the availability of fake products, and false advertising, which means consumers are often being deceived and their consumer rights are violated. Additionally, the greatest challenge is the lack of awareness among mass consumers. This analysis aims to determine, despite similarities in many cases, how far the neighboring countries of Bangladesh, India, and Pakistan have progressed in implementing consumer rights. Because these countries have a large number of consumers, establishing consumer rights is very important in this region.

To the best of my knowledge, there is a scarcity of research focused on the comparative analysis between these three countries together (but see Khan et al. (2023) & Rupam (2023)). For several years, the importance of consumer rights protection has increased globally. India was the first South Asian country to formulate a comprehensive consumer protection law, followed by Pakistan and Nepal (Nawaz & Kanwal, 2020). Consumer rights are highly protected in developed countries; however, due to a lack of knowledge and a reluctance to protest in cases of violation, consumers are often deprived of their rights in developing and underdeveloped countries (Islam et al., 2016).

A recent study (viz., Rizvi et. al., 2023) in Pakistan claims that March 15 is celebrated worldwide as World Consumer Rights Day, but still very few people know about their rights as consumers, and they are not aware of when there is a violation, where to lodge a complaint, or what actions should be taken to tackle this.

This research, therefore, seeks to answer the following questions:

1. What is the progress of the establishment of consumer rights protection in Bangladesh after the enactment of the Consumer Rights Protection Act 2009 so far?

2. How active and effective is the regulatory authority?

3. What policies or measures can Bangladesh adopt to strengthen consumer rights in relation to India and Pakistan?

The primary objective of this study is to identify best practices and policies that Bangladesh can adopt from other countries to implement and thereby strengthen the protection of consumer rights in the country. The study is structured as follows: it first presents the current overall situation of consumer rights protection in Bangladesh by analyzing the activities of the regulatory authority, DNCRP. Then it will proceed by focusing on the analysis of legal issues and their implementation and effectiveness in these countries, using the relevant laws of these countries, and also analyzing the relevant websites of the concerned government authorities of these countries, and trying to identify if there are any provisions in the laws of the compared countries that Bangladesh can adopt. Finally, it focuses on identifying the best practices and measures that the countries being compared employ to protect consumer rights within their own countries.

The outcome of this study can provide valuable insights for policymakers and the DNCRP, the sole government regulatory authority under the direct supervision of the Ministry of Commerce, which is responsible for protecting consumer rights in Bangladesh. Furthermore, the findings and policy implications of this analysis will benefit policymakers in Bangladesh in adopting best practices to strengthen the sustainability of consumer rights protection in Bangladesh.

METHODOLOGY

The research methodology used in this analysis includes a comprehensive review of both primary and secondary sources. Primary data is collected from consumer protection acts, regulations, and government

ISSN No. 2454-6186 | DOI: 10.47772/IJRISS | Volume X Issue VI June 2026

reports from India, Bangladesh, and Pakistan. Secondary data is collected from numerous scholarly journals, newspaper reports, and relevant websites of the three countries. To evaluate the current situation of Bangladesh consumer protection, this study critically analyses the data from the annual reports of DNCRP, such as the number of market monitoring activities conducted, the resolution of written complaints regarding violations of consumer rights by the authority, and how many awareness programs have been conducted so far to make consumers conscious. A key limitation of this research is that it relies solely on DNCRP primary data to describe Bangladesh's current condition. Further empirical and field-based research can be conducted to make this analysis more credible.

LITERATURE REVIEW

This literature review aims to analyze the existing literature on consumer rights within the context of Bangladesh, India, and Pakistan, and to assess the extent to which research has been conducted so far, with a primary focus on a comparative analysis among these countries. It is noteworthy to begin with a historical context by stating that in 1947, Denmark was the first country to establish consumer organizations, and then, in 1955, the United Kingdom followed suit (Kapoor, 2021). Additionally, Alam and Haq (2016), in their study, mentioned that there was a remarkable speech delivered in Congress by former President of the United States John F. Kennedy on March 15, 1962, regarding the four fundamental rights of consumers-

1. The right to safety
2. The right to be informed
3. The right to choose and
4. The right to be heard.

These four rights became known as the Consumer Bill of Rights and were later expanded to eight by the United Nations. Consumers International adopted these expanded rights and designated March 15 as World Consumer Rights Day (Visual.ly, 2013, as cited in Alam & Haq, 2016).

President John F. Kennedy, on March 15, 1962, stated to the Congress of the United States:

Consumers, by definition, include us all. They are the largest economic group in the economy, affecting and affected by almost every public and private economic decision. Two-thirds of all spending in the economy is by consumers. But they are the only important group in the economy who are not effectively organized, whose views are often not heard.

The term “consumer” denotes every human being in the world, including the newborn baby, who can also be considered a consumer because they are starting to consume breast milk. Simply, the consumer refers to the person who purchases products or services. According to Consumers International (2006), as stated above, eight fundamental rights[1] are considered as consumer rights. Many researchers have defined consumer rights as fundamental and constitutional rights in their studies (Islam et al., 2016; Alam & Haq, 2016; Nawaz & Kanwal, 2020; Mia & Mallick, 2021). Islam et al. (2016) stated that discussions about consumer rights are uncommon in Bangladesh; therefore, they strongly suggested that extensive further research should be conducted on consumer rights. A large volume of literature has been conducted on the country-based analysis of consumer rights protection, such as the context and legal framework (Islam et al., 2016; Alam & Haq, 2016; Huq et al., 2017; Voddepally & Reddy, 2020; Mia & Mallick, 2021; Rupam, 2023). However, few studies have focused on a comparative analysis between South Asian countries. For instance, Khan et al. (2023) have only conducted a sector-wise analysis of consumer protection laws between India and Pakistan. Additionally, it is essential to note that Khan et al. (2023) clearly highlighted in their study that India formulated its first Consumer Protection Act in 1986. On the other hand, the Consumer Protection Act in Pakistan was introduced

[1] The eight basic consumer rights are: the right to basic needs, the right to safety, the right to information, the right to choose, the right to representation, the right to redress, the right to consumer education, and the right to a healthy environment.

in 1995, although it was province-based. Amendments have already been made to these laws since their inception. Thus, both countries experienced significant improvements in terms of consumer rights protection, and the legal system also further developed in these two countries (see also Rupam, 2023).

Compared to India and Pakistan, consumer protection law in Bangladesh is still at an early stage since the CRPA was introduced in 2009, and the effectiveness of the implementation of the law is still very poor (Huq et al., 2017). Similarly, Mia and Mallick (2021) also concurred that consumer rights protection became familiar to the people of Bangladesh after the CRPA came into force in 2009. In Pakistan, all the goods and services availed of by the consumers are covered under the Consumer Protection Act. Even the goods and services provided by the government, private entities, and non-profit organizations are also considered applicable under the law (Alvi, 2017 as cited in Khan et al., 2023). Likewise, in the case of India too, the Consumer Protection Act covers all the goods and services purchased or availed by the consumers (Khan et al., 2023). But according to the CRPA of Bangladesh, only ten categories of services[2] are included in this Act, although it covers all the products. The scope of services in this Act is very limited.

Rizvi et al. (2023) indicate that the World Consumer Rights Day is celebrated globally on March 15, but very few people are aware of their rights as consumers. To identify this reason, a considerable body of literature argues that being poor and illiterate is the main reason in developing countries, and so the consumers are easily exploited by the fraudulent and unethical traders (Islam et al., 2016; Alam & Haq, 2016; Mia & Mallick, 2021). Mahatma Gandhi once said, "commerce without ethics is a deadly sin" (Rashid, 2015, as cited in Alam & Haq, 2016).

Rupam (2023) stated that the protection of consumer rights draws worldwide attention now-a-days. By addressing some loopholes, he also mentioned that Bangladesh should follow India and Pakistan’s structure, as these countries are much ahead of Bangladesh in terms of consumer rights protection. Accordingly, he continued by adding that the legal framework of Bangladesh is inadequate to protect consumer rights.

As a whole, the findings of this literature review are not up to the mark because there is a scarcity of empirical research on consumer rights protection in Bangladesh. Moreover, it is quite surprising that a plethora of significant studies have not been conducted on CRPA, so it is high time to carry out comprehensive research on consumer rights protection in the context of Bangladesh.

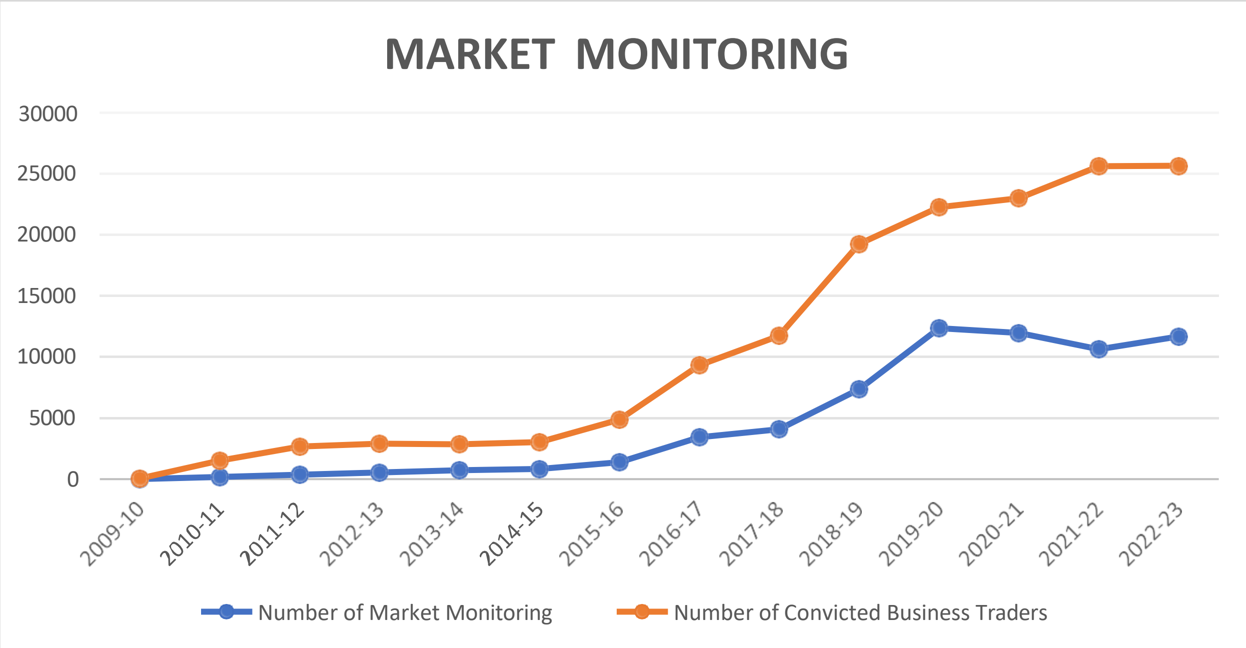
The Current State of Consumer Rights Protection in Bangladesh

Bangladesh, a densely populated South Asian country, has made significant improvements in economic growth and social development in the last couple of years, but the protection of consumer rights still seems not much improved, and especially, the majority of the population is yet to know basic knowledge about their rights as consumers. Some researchers, in their survey, found very low percentages in this regard, such as Nawaz and Kanwal (2020), who found that only 33.33% of consumers are aware of their rights as consumers, whereas 66.67% of consumers are completely unaware, and they said that they have no knowledge about consumer rights. Likewise, Arefin et al. (2020) conducted a survey to measure the awareness of consumers with the question of whether they ever cross-checked the weight of the products as mentioned on the item, and surprisingly, only 19% of the respondents said that they check, 6% of the respondents sometimes check, but 75% of the respondents don’t check at all.

It can be said that Bangladesh is still in its infant stage compared to India and Pakistan in terms of the establishment of consumer rights. Although before 2009, there were some provisions related to the protection of consumer rights included in a few laws, such as the Penal Code 1860, Special Powers Act 1974, and Drug Control Ordinance 1982, it is the CRPA, which came into effect on April 6, 2009, that is an entirely separate law for the protection of consumer rights in Bangladesh. I will provide a brief analysis of the CRPA in the next section. In this section, I will critically analyze the progress of establishing consumer rights in Bangladesh by examining statistics collected from DNCRP following the enactment of the CRPA in 2009.

[2] According to the Consumers’ Right Protection Act, 2009, “service” means transport, telecommunication, water supply, drainage, fuel, gas, electricity, construction, residential hotel and restaurant, and health services.

Figure 1. Number of market monitoring and convicted business traders by DNCRP



Adapted from DNCRP Annual Report (2022-23).

The figure above presents the overall statistics of the market monitoring conducted by the DNCRP since its inception. It is pretty evident from the graph that, until the 2015-16 fiscal year, both the number of market monitoring activities and the number of convicted business traders fell short of expectations due to inadequate manpower. However, later, the authority got some officers to carry out its activities. But the number is still insufficient for the authority to conduct its operations thoroughly nationwide. According to the above figure, until 2022-23, DNCRP has undertaken a total of 11,670 market operations, and a total of 25,645 unethical business traders were convicted, fined, and some were given orders to temporarily suspend their trade activities. This statistic is relatively insignificant for a highly populated country like Bangladesh, given that there are almost 170 million consumers and a vast number of shops located in nearly every alley across the country.

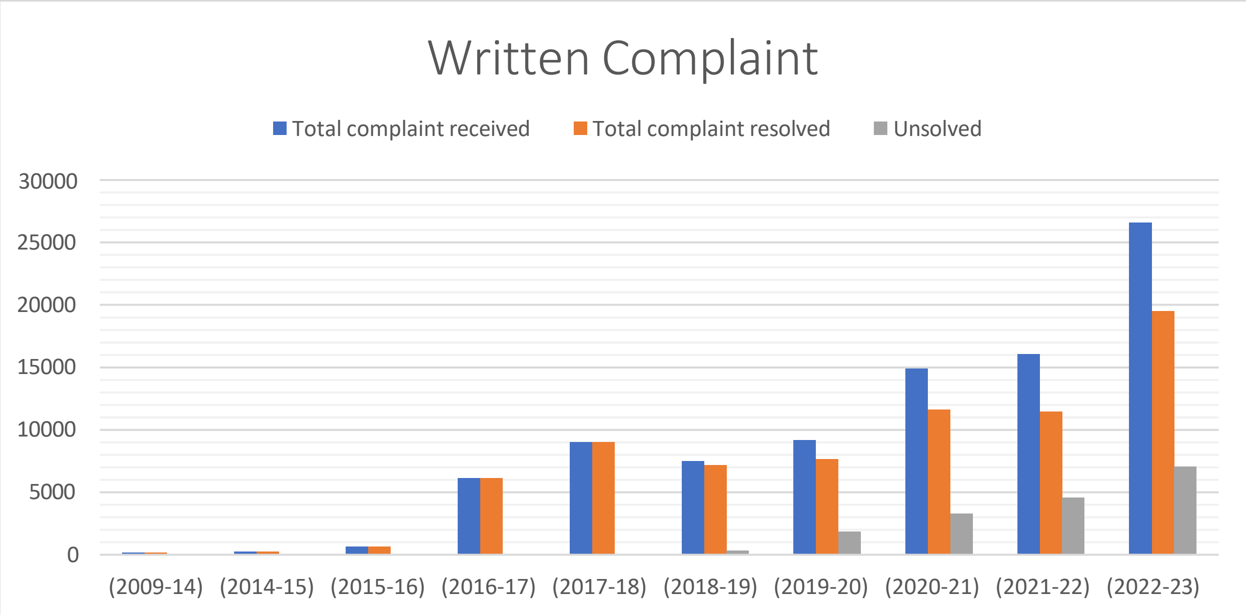
Moreover, most market monitoring is conducted in urban areas, and there has been insufficient monitoring in remote areas. The avoidance of rural consumers in rural areas is not due to the authority's unwillingness, but rather to a lack of manpower. Therefore, people living in rural areas are often vulnerable to the violation of their consumer rights.

There are sixty-four districts under eight administrative divisions in Bangladesh. According to the current organogram of DNCRP, there is only one Assistant Director, one Office Assistant cum computer typist, and one Office Associate post at the district level. Although the Office Associate post was newly added, no personnel have been appointed yet for this position. It is therefore clear that this is a Herculean task for the DNCRP to conduct its activities and implement the objectives of the law. Apart from market monitoring, the authority has to perform other tasks as well, such as resolving received written complaints by hearing both parties and conducting awareness programs, including public hearings and seminars.

Since its inception on June 28, 2009, DNCRP has been experiencing a severe shortage of manpower to implement activities under the Act, alongside administrative tasks. Due to a very scarce workforce, the authority could not function properly for the next few years, and its activities were severely limited. The shortage of manpower has a significant impact not only on market monitoring but also on resolving complaints received by the authority. The figure displayed below portrays a shortage of manpower:

ISSN No. 2454-6186 | DOI: 10.47772/IJRISS | Volume X Issue VI June 2026

Figure 2. Statistics of written complaints received by DNCRP



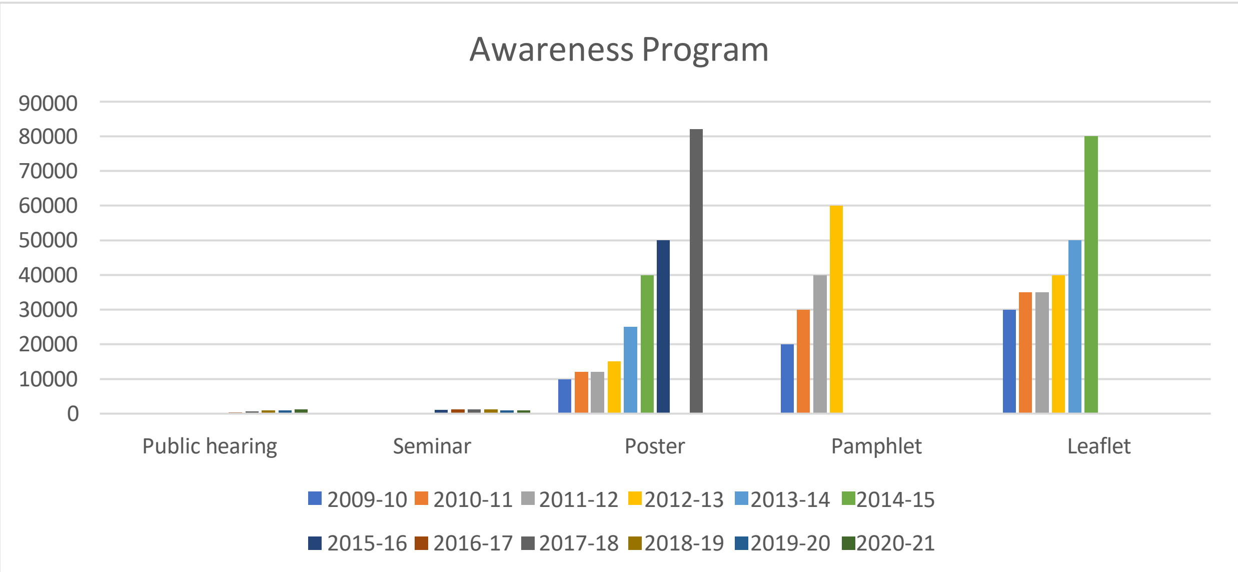
Adapted from DNCRP Annual Reports (2020-21) and (2022-23)

In this figure, it is clear that the number of complaints has increased significantly over time. However, the opposite trend occurred in terms of resolving written complaints, which showed a declining trend, indicating that the number of unresolved cases has been increasing. Initially, DNCRP received very few complaints until the fiscal year 2015-16. However, since the 2016-17 fiscal year, the number of written complaints has increased, and it has remained steady until the 2019-20 fiscal year. The following year, the number had risen slightly, but in the 2022-23 fiscal year, the number of written complaints had skyrocketed.

On the other hand, the number of unsolved cases began to increase since 2018-19, although it had been shallow. However, from the following year, this rate showed a gradual increase every year. The reason behind this scenario could be a lack of manpower and insufficient logistical support from the Directorate.

Apart from market monitoring, DNCRP regularly organizes seminars, workshops, and public hearings to raise awareness among consumers. During market monitoring and in awareness programs, the authority distributes leaflets, pamphlets, and posters among consumers to make them aware of their consumer rights.

Figure 3. Awareness Program and distribution of leaflets, pamphlets, and posters by DNCRP



Adapted from DNCRP Annual Report (2020-21)

Overall, the data indicate that the authority has basically left no stone unturned in making consumers aware of their rights. However, it is an arduous task for the authority to carry out all these activities with its minimal manpower. According to the 2022-23 annual report of DNCRP, only 179 employees are working in the Directorate, yet they have been tasked with protecting the rights of around 170 million consumers, which seems ridiculous. Essentially, DNCRP's primary objective is to educate consumers beyond merely identifying dishonest traders and imposing penalties on them. The authority will be successful when the majority of consumers are aware of their rights as consumers, and the number of complaints is reduced to zero.

A Review of Consumer Rights Protection in Three Countries

The Context of Bangladesh

The CRPA is currently the primary legal document protecting the rights of consumers in Bangladesh. However, before the enactment of this law, forty laws were in place to protect consumer rights in the country (Mia & Mallick, 2021). People were largely unaware of consumer rights back then, although the topic is still considered relatively new to the majority of consumers in Bangladesh. After the enforcement of the CRPA, this topic became familiar to consumers in the country. Pursuant to Section 18 of this Act, the DNCRP was established as a regulatory authority under the direct supervision of the Ministry of Commerce, Bangladesh, in 2009 to implement the law and develop consumer rights in the country.

According to Section 21 of the CRPA, the Director General (DG) of DNCRP can take all the necessary action to protect the rights of the consumers, to prevent anti-consumer rights practices, and can provide a remedy to the consumers if they make a complaint after being deceived by buying any products or availing of services included in the CRPA. On the other hand, section 57 of Chapter 5 states that the offenses under this Act can be judged by a first-class magistrate or metropolitan magistrate as well. Additionally, the DNCRP is empowered to take administrative action against anti-consumer activities. The Director General or any other officer empowered by him can take administrative action to prevent the violation of consumer rights practices described in Chapter 4 of the CRPA. The action can be as simple as imposing a fine, or if necessary, they can revoke the trade license of the illegal traders or even issue an order to temporarily or permanently suspend all commercial activities.

It has been more than a decade since the CRPA was formulated, but no amendments have been made to the Act so far. According to the Annual Report (2013-14) of the DNCRP, an initiative was taken once to amend the Act during that fiscal year. A committee consisting of six members was formed to make the necessary amendments and submit the draft to the Council within three months. The committee submitted the draft, which was subsequently adopted and approved by the Council. The approved draft was then sent to the Ministry of Commerce for the necessary steps to be taken. It has been more than a decade, but the Act remains unamended. The amendment of the backdated Act is a dire need to cope with the current context of global change, especially in light of the digital medium, as online shopping has become a trend in every sphere of shopping.

Currently, digital platforms are extremely popular and convenient for consumers in Bangladesh, particularly since the COVID-19 pandemic. At that time, this platform became a significantly used medium due to the situation. Marketing and selling through online media are increasing day by day, and numerous consumer rights violation cases have already been filed with the DNCRP, with the number of complaints also growing gradually. But there is no provision about online marketing in the CRPA 2009. So, it is high time to amend the Act. The neighboring country, India, also incorporated digital matters in the Consumer Protection Act 2019, which was the updated version of the Consumer Protection Act 1986.

According to Payments & Commerce Market Intelligence (PCMI), despite challenges such as low financial penetration, the e-commerce sector in Bangladesh is growing at an impressive rate, making the country a rising star in the Asia-Pacific e-commerce market.

Figure 4. E-commerce statistics of Bangladesh

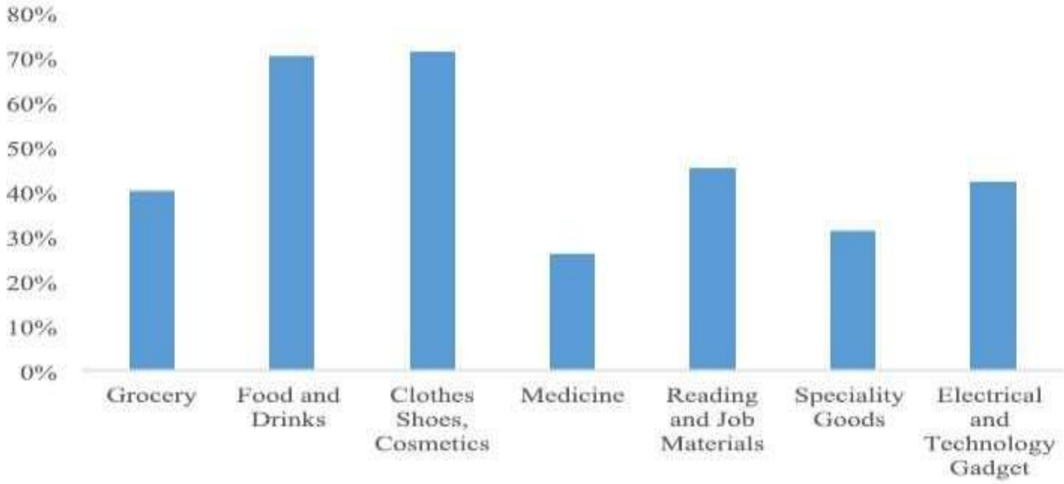
Key e-commerce statistics for Bangladesh (data from PCMI)

- **E-commerce volume in Bangladesh for 2024:** US$9 billion
- **Compound Annual Growth Rate (CAGR) for 2024–2027:** 12%
- **Forecasted e-commerce volume in Bangladesh for 2027:** US$13 billion

Source: PCMI Website.

Due to the COVID-19 lockdown, Bangladesh, like other countries, experienced a significant increase in online shopping in 2020, with a 70% rise compared to 2019 (Enam et al., 2024). Consumers started buying almost everything online, and as a result, many people began conducting entirely online businesses. Selling homemade food products is particularly dominant in this case. However, the problem is that an online business can be started simply by opening a Facebook account. They are sometimes out of trace because they don't have to register or obtain a trade license from any authority, and some unethical people take advantage of this by using fake addresses. This happens especially in the case of online clothing shops. There is a growing number of such complaints received by DNCRP, but in most cases, the authority cannot provide any solution to the consumers because most of the shops' addresses are fake. These types of violations are increasing at an alarming rate; if they cannot be controlled, they will hinder the establishment of consumer rights in the country. People nowadays are heavily dependent on online shopping, purchasing almost everything from groceries to fashion products.

Figure 5. Percentage of buying different products online by consumers



Source: (Enam et al., 2024)

In the above figure, it is evident that food and drinks, as well as clothes, shoes, and cosmetics, are the most commonly purchased items online, with around 70% of consumers buying these products online. Additionally, around 40% of consumers buy groceries online, and nearly 30% also purchase medicine.

There are no alternatives; however, it has become indispensable to amend the CRPA as soon as possible to cope with the current trend. Due to several loopholes in the Act, many cases cannot be addressed, which is an obstacle to the establishment of consumer rights. For this reason, consumers also lose hope if they don't receive a solution after being deceived when they purchase products or services. One of the significant limitations of the Act is that the area of service is minimal, although all products are covered under this Act.

According to Chapter 1 of this Act, subsection 22 of Section 2 limits the service to only ten categories. A broader area of service is out of range in this Act. Limitations in the service sector pose an obstacle to effectively protecting consumer rights, as the fundamental legal framework of consumer protection law should encompass all goods and services.

The rights of consumers should not be confined to a few sectors; instead, they should be ample. All goods purchased and services availed by consumers are protected under consumer rights; however, the CRPA 2009 is an exception in this case. Consumer rights are being violated regularly in services that are not included in the CRPA but are part of a consumer's day-to-day life. However, these violations are often unaddressed, and as a result, consumers are deprived of their rights in these sectors. Furthermore, consumer rights are usually disregarded in such cases. So, consumers who are being exploited lose hope regarding legal issues, and this deprivation creates a negative impression about the government and the legal authority among consumers.

According to Hossain (2020), numerous shortcomings were identified in the CRPA 2009, including the limited options for consumers to obtain remedies, a lack of standardization principles in the legislative system, and poor design, which failed to ensure proper consumer protection. Another concerning factor is that, according to Section 73 of the CRPA, DNCRP can inspect and find out any shortcomings occurring in the private health care services, but is restricted from taking any measures against those findings; the authority can only inform the Secretary of the Ministry of Health and the Director General of the Department of Health about the violations.

The Context of India

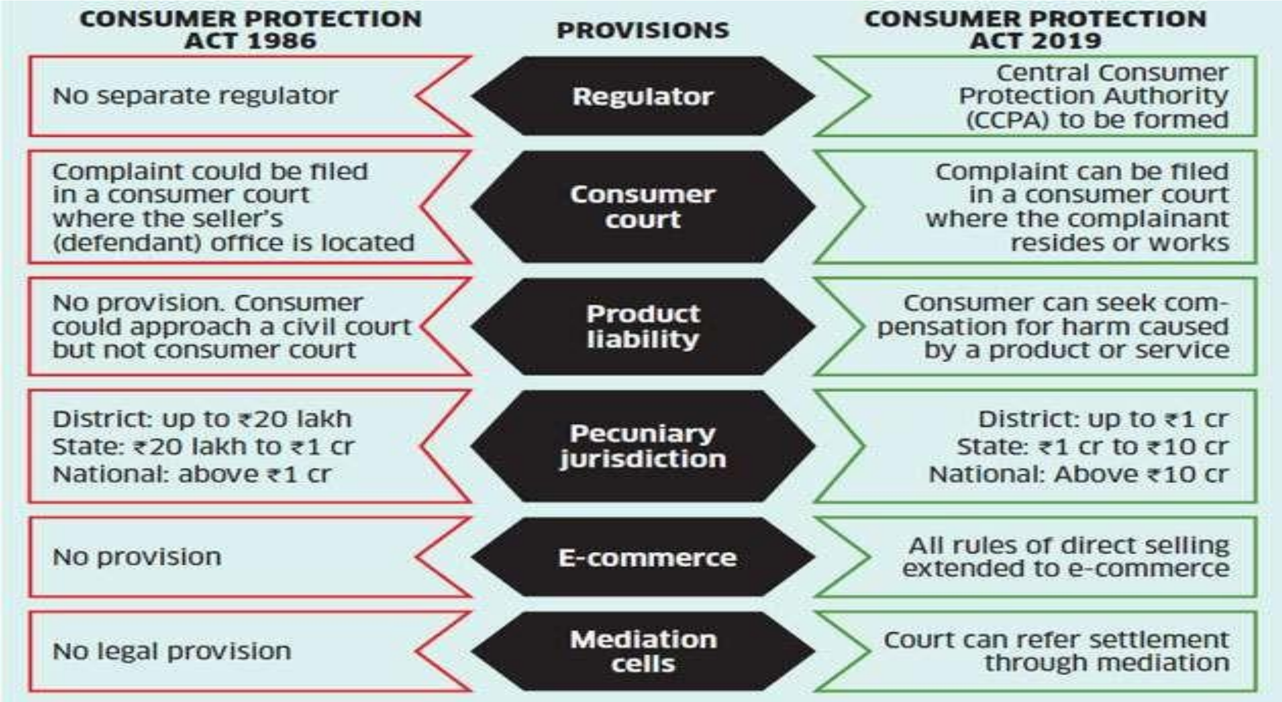
Protecting the rights of consumers from fraudulent, inequitable, and unethical practices has been a fundamental aspect of Indian culture, business, and governance for centuries. Numerous consumer-related affairs were discussed in ancient books; among them, the Manu Smriti was the most prominent. In ancient India, the notable book Artha Shastra, written by Kautilya, is considered one of the oldest and most influential books on commerce and trade. In this book, the author describes various penalties for illegal traders who engage in unethical business practices (Didwal & Chauhan, 2022).

In the Indian subcontinent, India was a pioneer in ensuring the establishment of consumer rights protection by formulating the Consumer Protection Act in 1986. This Act was a milestone for consumers in the country. Later, this Act was first amended in 2002, when several sections were revised, and some new sections were added to reflect the context of contemporary times. Furthermore, in 2019, it was amended again to adapt to the updated global context, which strengthened the consumer protection legal framework compared to earlier versions. Rupam (2023) stated in his study that India took the first initiative many years ago to protect consumer rights. The formation of the Consumer Guidance Society (CGS) in 1966 marked a pioneering step in protecting consumer rights. Furthermore, in 1969, the Monopolistic and Restrictive Trade Practices (MRTP) Act was launched, which essentially consolidated all the fragmented provisions of consumer rights protection under various laws.

The world is now in the digital era. In this arena, everything revolves around digital technologies, with the widespread use of artificial intelligence, the Internet of Things (IoT), and cloud computing. Digital marketing and online shopping have become increasingly popular worldwide in recent years, particularly during the COVID-19 pandemic, reaching an unprecedented level of global acceptance among consumers due to their convenience. One of the milestones in protecting consumers in India, who are heavily dependent on online shopping and services, is the addition of special provisions for e-commerce in this Act. Section 7, clause 2(B) of this Act clarifies the definition of consumers, which includes buying any goods and availing any service, regardless of whether the transaction is offline or online, through teleshopping or using any online platforms.

The Consumer Protection Act 2019 is a comprehensive extension of the Consumer Protection Act of 1986. Some key features of this Act include the establishment of a regulatory authority, namely the Central Consumer Protection Authority (CCPA); the addition of mediation as an alternative dispute resolution; the introduction of product liability, which basically made product manufacturers and service providers accountable for any defects; the unique addition of six consumer rights; and specific penalties for misleading advertisements with particular fines.

Figure 6. Comparison between the Consumer Protection Act, 1986, and the Consumer Protection Act, 2019



Source: (Raju & Singh, 2019)

The 2019 Act is a timely update of the 1986 Act, which accelerates consumer rights by one step with compatible amendments. Now, with this strengthened and transparent Act, consumers are more empowered, and their rights are more efficiently protected. Viswanathan & V (2021) also stated that the CPA 2019 is undoubtedly a significant milestone in addressing several unaddressed issues that have been prevalent in the market for the last three decades, most importantly, digital consumerism. Consumers are now more empowered to a great extent with this updated Act.

Another unique initiative is the inclusion of Chapter 5 in the 2019 Act, which primarily concerns mediation. This is an alternative dispute resolution through mediation between the two parties. The government can establish a consumer mediation cell by appointing several empaneled mediators. The mediation procedures will be held in the consumer mediation cell attached to the District Commission, the State Commission, or the National Commission.

The straightforward identification of six consumer rights and the addition of Chapter 6, which addresses product liability, are two key features of this 2019 Act. This product liability has made manufacturers, sellers, and service providers more transparent and accountable for any defective products or services they provide. The specified six consumer rights are-

1. right to safety
2. right to information
3. rights to choice
4. right to be heard
5. right to redressal and
6. right to awareness

Therefore, India is now significantly ahead of Bangladesh and Pakistan in terms of implementing consumer rights protection, as outlined in the CPA 2019. Bangladesh should consider this Act to amend its existing Legislation.

The Context of Pakistan

Pakistan is exceptional in its legislative system for consumer rights protection, as it lacks a unified single law for the entire country. India and Bangladesh have separate single laws that apply to the whole nation. In contrast, in Pakistan, there are separate laws for specific provinces that apply only to that particular province. Pakistan has agreed to adopt UN General Assembly Resolution No. 39/248 of 1985 by consensus, which provides a framework for member states to protect consumer rights. According to UN guidelines, member countries are permitted to establish their own laws in accordance with their social and economic conditions. Moreover, to address the requirements of the UN Resolution guidelines, Pakistan introduced its first separate law solely for the protection of consumer rights in 1995, namely the Islamabad Consumer Protection Act 1995, which applies to the capital of Pakistan, Islamabad. Following this path, just two years later, the Khyber Pakhtunkhwa Consumer Protection Act, 1997 was formulated for the Khyber Pakhtunkhwa province, the Balochistan Consumer Protection Act, 2003 was inaugurated for the territory of Balochistan province; Punjab has adopted the Punjab Consumer Protection Act, 2005, and finally, the Sindh Consumer Protection Act, 2014 was formulated to protect the consumers of Sindh province. However, Idrees et al. (2022) claimed that the suffering of consumers did not change significantly due to the lack of a government strategy and the dispersed nature of provincial laws in Pakistan. He emphasized a single common law, as an example, mentioning the central law and regulatory authority in America, Europe, and India. The Federal Trade Commission of America is authorized to protect consumer rights nationwide through a central and uniform law. Likewise, the Central Consumer Protection Authority (CCPA) of India has the power to exercise and defend the rights of consumers at the federal level. In addition to that, the “European Union Consumer Protection Cooperation Network (CPC)”, a union of domestic officials, is engaged to monitor the efficiency level of consumer protection laws across the European Union (Idrees et al., 2022).

Ahmed (2020) compared the provincial laws and stated that, among all the provincial Acts, the Punjab Consumer Protection Act, 2005, is comparatively more effective. Under this Act, 17 consumer courts have already been established to address consumer complaints since its enactment. In terms of complaints received, the Lahore Consumer Court is the largest in Punjab. However, in the fiscal year 2025-26, the Punjab Consumer Protection Act was amended, and according to this revised Act, all 17 district consumer courts have been removed from Punjab. A total of 1,682 pending cases province-wide were under trial in those courts that had been transferred to the office of the District and Sessions Judge. Now, the sessions and additional sessions judges in the province have been assigned to hear consumer cases instead of the recently abolished consumer courts (Pakistantoday.com.pk, 2025).

According to The Nation (2025), the Punjab government has decided to abolish the consumer courts due to high operational costs compared to the relatively low number of cases. The Directorate of Consumer Protection Council published that only 8,381 cases were filed in these courts in the past three financial years.

Critical And Comparative Analysis of the Three Countries

Legal Framework

By analyzing the legislative frameworks of India, Pakistan, and Bangladesh, it is evident that India is ahead of Bangladesh and Pakistan in protecting consumer rights, particularly in terms of legal issues, institutional framework, and proper law implementation, ultimately establishing consumer rights nationwide. One thing to note here is that, initially, provisions relating to consumer rights protection were already scattered across several different laws. Later, India was a pioneer in consolidating all scattered clauses within a single framework by formulating the Consumer Protection Act in 1986. Similarly, the first comprehensive law on consumer protection was introduced in Pakistan in 1995, providing a framework for consumer protection. However, this law only applies to the territory of Islamabad, and the relevant Act is known as the Islamabad Consumer Protection Act 1995. Besides this law, Pakistan has several provincial laws, including the Khyber

Pakhtunkhwa Consumer Protection Act 1997, the Balochistan Consumer Protection Act 2003, the Punjab Consumer Protection Act 2005, and the Sindh Consumer Protection Act 2014. The principal purpose of all these provincial laws is the same, which is to safeguard consumers in every province. However, Bangladesh was far behind India and Pakistan in terms of enacting a comprehensive law for consumer protection. In 2009, the Consumer Rights Protection Act (CRPA) was formulated as a sole legal framework to protect the rights of consumers in the country. Following the enactment of CRPA in 2009, more than a decade has passed, yet no amendments have been made to this Act, despite numerous changes occurring in the country and worldwide. However, India and Pakistan have periodically updated their laws, further strengthening the establishment of consumer rights. In contrast, Bangladesh continues to safeguard consumer rights with the same outdated law. Upgrading the CRPA has become highly indispensable for Bangladesh now.

There are numerous loopholes to be addressed in the CRPA, 2009. One major issue is that the scope of service is very limited in this Act, as mentioned earlier. However, India and Pakistan have no such limitation in the service sector; all products and services, including government-provided services, can be addressed under the purview of their Acts. Limitations in the service sector are the weakest point of the CRPA, as consumer rights should not be confined to specific industries alone. Due to this limitation, many issues cannot be addressed. Consumers who are deceived by availing sectors outside of the particular ten categories cannot obtain any remedy, and thus, their consumer rights are neglected.

One thing to note here is that in India and Pakistan, filing a complaint by a consumer differs slightly from that in Bangladesh. According to the Acts of India and Pakistan, if a consumer is deceived by buying any products or availing any service, they must first send a written letter to the seller or manufacturer regarding the complaint. The manufacturer is then bound to provide a reply to the consumer in accordance with the Act. If the manufacturer fails to reply or doesn't reply, then the aggrieved consumer can complain to the authority seeking the remedy. However, in the case of CRPA of Bangladesh, there is no provision for first sending a letter to the manufacturer regarding a complaint. Instead, the consumer can file a complaint directly with the authority without informing the manufacturer if they are being deceived.

There is a provision in the CRPA section 76(4) that if a fine is imposed on a convicted trader after they are found guilty, then 25% of that imposed fine will be provided to the complainant immediately. However, officers or employees of the Directorate will not be eligible for this remuneration. This was introduced primarily for the convenience of consumers, to encourage them to make a complaint if they are being deceived. This is a unique system because this type of remuneration system is not available in the Acts of India and Pakistan.

Offenses and Penalties

The current CRPA of Bangladesh imposes a very low penalty for violating consumer rights compared to the Act of India. In terms of imposing a fine, the maximum fine for some violations is not more than two lakhs (Bangladesh Taka). This covers violations such as selling adulterated goods or medicine, mixing prohibited materials in foodstuffs, deceiving consumers with false advertisements, manufacturing fake goods, and any act detrimental to the life or security of the service receiver, as well as damaging money, health, or life by negligence. However, according to Section 89 of the CPA 2019 of India, the punishment for a manufacturer or service provider who causes false advertisement can be imposed to a maximum of ten lakhs (Indian Rupees). For every subsequent offense, the fine can be extended to fifty lakhs rupees. Moreover, section 90 states that if any person, or on behalf of that person, manufactures, sells, stores or imports any product containing an adulterant and if that doesn't cause any harm to the consumers, then the fine is a maximum of one lakh rupees. Still, if it causes injury not amounting to grievous hurt to the consumers, then the fine is a maximum of three lakh rupees; also, if it causes injury resulting in grievous harm to the consumers. The fine is a maximum of five lakh rupees, but if it causes the death of a consumer, the fine should be not less than ten lakh rupees, which means a minimum of ten lakh rupees, but there's no maximum limit.

Therefore, the number of penalties should be increased when considering the amendment of the CRPA in Bangladesh, as the current penalty system is very minimal for giant business corporations that violate the law.

The maximum amount should be increased, but no amount should be fixed as a minimum, so that the fine can be imposed based on the capability of the business traders.

Institutional Framework

The regulatory authority in Bangladesh, DNCRP, is essentially a quasi-judicial organization that conducts its activities in accordance with the Consumer Rights Protection Act, 2009. The headquarters of DNCRP is located in Dhaka, the capital of Bangladesh, on a rented floor. It has divisional & district offices in 8 divisions and 64 districts, with minimal manpower & no logistical support. Surprisingly, there are only 84 officials in total throughout the country who are responsible for protecting consumer rights for the approximately 170 million consumers. The institutional framework is very weak, and there is almost insufficient logistical support. Conducting regular market monitoring and addressing written complaints received from the affected parties are the primary responsibilities of a DNCRP officer. However, in a district-level organogram setup, there is only one officer and one office assistant who have to perform all administrative tasks, along with market monitoring and resolving written complaints by hearing them. Therefore, it is evident that this is one of the hindrances to establishing consumer rights. DNCRP receives numerous complaints about consumer rights violations every day. Still, due to insufficient manpower and necessary support, it is a challenging task to provide a proper solution within a short timeframe.

According to Section 5 of Chapter 2 of the CRPA, to implement the objectives of this Act, a council will be established, namely the "National Consumers' Right Protection Council", which consists of 29 members. The Honorable Minister of Commerce will be the Chairman of the Council, and the Director General of the Directorate will act as the Member Secretary of the Council. The Council was established on November 24, 2009, and its first meeting was held on December 9, 2009. The implementation of consumer rights in Bangladesh essentially began with this meeting.

The authority has taken numerous initiatives to protect consumer rights. On March 15, 2020, on World Consumer Rights Day, DNCRP inaugurated a Hotline number – "16121" - "Vokta Batayon" to ease the process of complaining. After this, consumers can complain at any time if they are being deceived or if their consumer rights are violated, without incurring any fees for the call, as the hotline number is free to use. Moreover, the same year, an e-payment system for consumers was introduced, offering a 25% incentive on the imposed fine for those who complain. In this case, the complainant does not need to come to the office to collect the remuneration; rather, it can be paid through an e-payment medium, which becomes very convenient for the consumers.

Furthermore, to receive consumer complaints, a separate division was established, namely the National Consumer Complaint Center (NCCC), at the headquarters of DNCRP on August 3, 2014. Initiating the Consumer Complaint Management System (CCMS) software is another significant initiative launched by the authority to protect consumer rights. On March 15, 2023, the then-honorable Minister of Commerce inaugurated this software. This was a step ahead in the digitalization of the system, allowing consumers to lodge complaints easily and conveniently. Earlier, consumers could make a complaint through email, fax, by using the hotline number, or by physically appearing in the office, but they had no option to track the status of their complaint. With this software, they will now be able to track their complaint at any time.

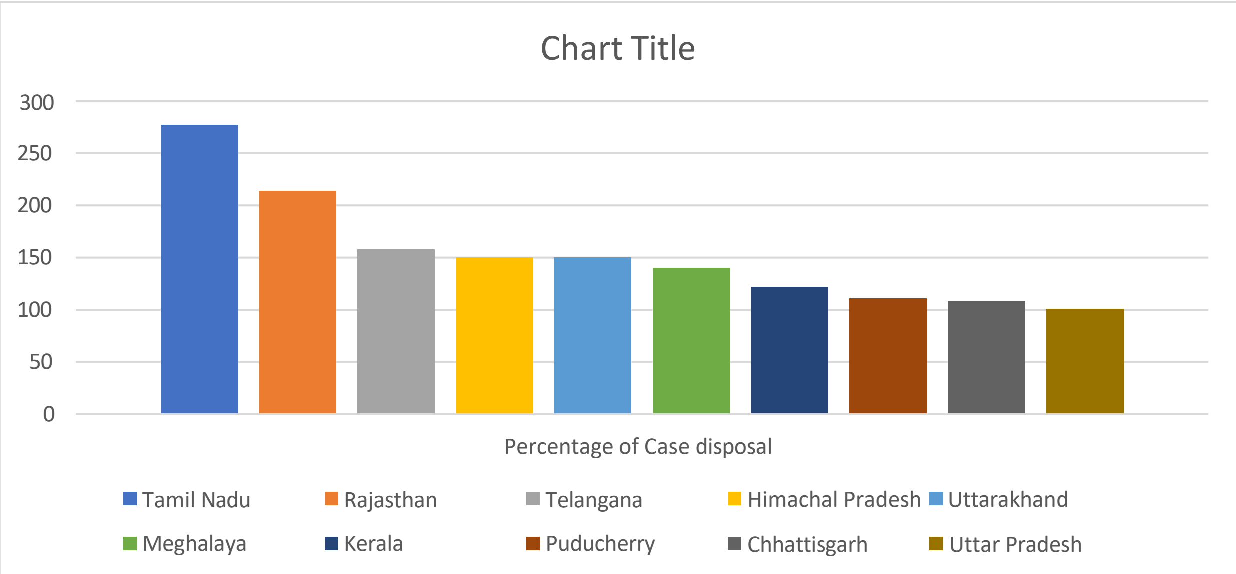
One major loophole in the CRPA of Bangladesh is that there are no separate consumer courts to address the issues of consumer rights violations. If any problems arise, they must be resolved in the general court. However, the problem is that, according to the Act, consumers cannot go directly to court; instead, they have to file a case through the Directorate DNCRP. Currently, according to the CRPA, there are three ways to obtain a remedy in the event of a consumer rights violation. The three remedies are (1) Administrative, (2) Civil, and (3) Criminal. Among these, administrative remedies are the most commonly used method for addressing issues of violations. Section 70 of the CRPA mentions that DNCRP can take administrative action. Consumers who are aware of their consumer rights are primarily familiar with the administrative remedy. The civil and criminal procedures are not practiced due to some complications in the Act; therefore, consumers are not aware of these. The administrative way is more convenient compared to the other two remedies. Consumers lodge complaints to the Directorate physically or through online mediums such as email, telephone, and fax.

Most importantly, the Directorate now has a hotline number, 16121, to ease the process of receiving complaints. Additionally, there is a fear among citizens of lodging complaints in the general courts due to the time-consuming nature of the process, as the complainant must pay a case lodging fee and an advocate's fee for filing a complaint. However, in the administrative process, consumers do not need to pay any fees, and no advocate is required to file a complaint. Therefore, the process of obtaining a remedy through the administrative process is quite convenient compared to the other two options for consumers.

However, in India and Pakistan, there are several courts designated solely to address issues of consumer rights violations. This is severely lacking in Bangladesh. By amending the existing Act, the establishment of the court can be incorporated in the Act. In Pakistan, all provincial acts establish consumer courts. To illustrate, Section 26 of the Punjab Consumer Act directs the establishment of one or more consumer courts to exercise the powers of this Act. Likewise, the Sindh Consumer Protection Act also provides for the establishment of one or more consumer courts in Section 27(1).

Regarding consumer education, India and Pakistan have already established awareness regarding consumer rights at an early stage. It is noteworthy to mention that India has a separate ministry dedicated to protecting consumer rights, namely the Ministry of Consumer Affairs, Food & Public Distribution. According to The Economic Times, after being launched on January 1, 2025, the e-Jagriti platform received 85,531 cases filed throughout the year, and over two lakh consumers have registered on this platform as of August 6, 2025. Consumers can register on this platform via OTP-based authentication, lodge complaints from anywhere in the country, including from abroad, pay fees online or offline, and track the progress of their filed case easily. According to a recent report, in July 2025, the disposal rate of consumer cases was 122 percent, as per the National Consumer Disputes Redressal Commission (NCDRC) of India. According to the Department of Consumer Affairs, ten other states in India also achieved a disposal rate of more than 100 percent in July 2025, indicating that the number of solved cases exceeded the number of cases received in July. It’s a good sign of progress for India in establishing consumer rights protection (The Economic Times, 2025).

Figure7. The percentage of case disposal in July, 2025 in ten Indian States



Adapted from The Economic Times (2025).

The above figure clearly indicates that ten states in India had a significant consumer rights-related case disposal rate, which exceeded 100 percent. Tamil Nadu and Rajasthan were at the forefront, with case disposal rates of 277 percent and 214 percent, respectively.

Khan et al. (2023) noted in their study that India has already integrated consumer education into the curricula of educational institutions, including schools, colleges, and universities. Important topics, such as consumer rights, product safety, and ethical trade practices, are incorporated into subjects like social sciences, economics, and business studies. Additionally, some consumer clubs were established in educational institutions to raise awareness among students, enabling them to participate actively in consumer protection activities. To stimulate consumer education, these clubs arrange seminars and campaigns.

On the other hand, Pakistan has also incorporated consumer education into the school syllabus to familiarize students with the fundamental ideas of consumer rights and responsibilities at an early stage (Khan et al., 2023). However, Bangladesh is still far from implementing this. Although some business studies courses at the university level include consumer-related issues, there is no coverage of consumer rights at the primary and secondary levels. Incorporating fundamental information from primary and secondary level textbooks can be a great initiative to increase awareness among consumers at an early stage regarding their rights as consumers. It will significantly help in creating a consumer rights-conscious society in the country.

The institutional framework in India is quite strong. The updated 2019 Act empowers the three-tier Consumer Disputes Redressal Commissions with greater authority to address consumer rights violations. The District Consumer Disputes Redressal Forum has now been elevated to the District Consumer Disputes Redressal Commission, which has the jurisdiction to handle complaints where the value of the goods or services is up to one crore (Indian rupees); previously, it was up to twenty lakhs rupees. Likewise, the State Commission can deal with cases where the value is between one crore and ten crores, which was previously between twenty lakhs and one crore. Finally, the National Commission can exercise its jurisdiction where the value exceeds ten crores, whereas it was previously limited to one crore.

Some of the praiseworthy additions in this Act should be discussed briefly here, such as Chapter 3, which was newly added in this Act, which is about the establishment of the Central Consumer Protection Authority (CCPA), a regulatory body to address violations of consumer rights, such as unfair trade practices and false or misleading advertisements. This central authority will have an investigation wing headed by a Director General. The Director General will conduct inquiries or investigations into consumer rights violations, unfair trade practices, or false or misleading advertisements under this Act. It is empowered to carry out investigations and take actions when it is confirmed and authenticated that the rights of consumers are being violated, such trade practices occur that are unfair, and such advertisements are disseminated that are false or misleading to consumers. Additionally, this investigating authority has the power to access and search any premises to conduct an investigation.

CONCLUSION AND POLICY RECOMMENDATIONS

In conclusion, it can be said that India outperforms Bangladesh and Pakistan in this region in terms of protecting consumer rights. Bangladesh still has a long way to go in terms of consumer rights protection. Consumers are a crucial factor in a country's economy, and ignoring their rights can act as a barrier to its development. It is notable to mention here that raising awareness among consumers is a significant challenge for these three countries. It is challenging for India and Pakistan, especially India, because this is a huge country compared to Bangladesh. For Bangladesh, it is very possible to raise awareness among consumers, even in remote areas across the country, through effective policy implementation and a targeted roadmap.

Ultimately, this research offers several policy implications for Bangladesh. However, this study does not claim that these recommendations are the best suggestions to adopt, but it strongly recommends considering these implications and scrutinizing them. If policymakers find these useful, they can be adopted as a tool to establish sustainable protection of consumer rights in Bangladesh.

Firstly, it is very necessary to amend and update the existing CRPA 2009. Here are a few things to highlight while updating the Act-

1. The inclusion of e-commerce has become a crying need to cope with the digital era.

2. The service sector should cover all services, including government-provided services. Currently, it is limited to only ten categories of services. It is not possible to effectively protect consumer rights with a limited scope of services.

3. The existing fines and penalties are very minimal in relation to the crime. Therefore, it is essential to adjust the fine amount in a manner that makes it applicable to the condition of the traders. The punishments should be stricter to discourage malpractices.

4. Like India and Pakistan, the establishment of separate consumer courts must be included as a provision in the updated Act because this is the justifiable way to provide a remedy to the consumers who suffered a violation. To provide a swift remedy, judicial action is necessary to ensure the protection of consumer rights.

Secondly, the basic knowledge of consumer rights must be ingrained in elementary textbooks so that, from an early age, consumers become aware of their rights as consumers. This must be implemented to get a well-educated consumer in the next generation.

Thirdly, to disseminate the law and raise awareness among consumers, DNCRP distributes leaflets and pamphlets, which are often filled with lengthy text that can be irritating to the general consumer. To remove this, the brochures and pamphlets should be very short and straightforward.

Fourthly, another essential step that can be taken is to bring the market committee under the purview of the law. There is a market committee in every market, and their job is to conduct monitoring over all the shops and prevent anything mischievous from occurring in their market. However, in reality, these committees are not that active. To make them active and accountable, some stern measures can be considered, such as imposing fines for those who fail to perform their jobs. If the committee in a market is robust and active, half of the job is already done there.

Fifthly, if the above policies can be adopted, the authority's duties will increase significantly. The authority is already suffering from a shortage of manpower. So, the enforcement mechanism and institutional framework must be strengthened. It can be achieved by improving human resources, providing sufficient logistical support, and arranging practical training for the personnel of the authority. It would be beneficial if the DNCRP could be upgraded to an independent and autonomous authority, enabling it to operate its activities independently. Moreover, logistics support should be increased, and some technical experts can be appointed to handle technical issues, resolve complaints, and monitor the market.

Sixthly, it is challenging to reach all consumers, particularly those residing in remote areas. Some government departments are required to travel to very remote areas to conduct their work. Therefore, it can be a collaboration to reach those remote consumers through these departments.

Seventhly, a mediation cell can be established, serving as an alternative dispute resolution mechanism to resolve complaints efficiently.

Finally, due to the nature of the job, the authority often has to seize samples from the market. However, to test these samples, it must rely on other laboratories, which is a time-consuming process. Therefore, a separate and modernly equipped laboratory can be established under the DNCRP to provide test results quickly to the authority.

It may be concluded that Consumer rights protection should be a great concern for policymakers because, first, it is directly related to the rights of the citizens of a country, and ensuring basic rights is the core responsibility of a policymaker. By considering the best practices that the neighboring countries adopted to strengthen and protect consumers in their countries, Bangladesh still has a long way to go and should integrate those practices and advance the policy by conducting more evidence-based research.

ACKNOWLEDGEMENT

This paper is based on a (supervised) research project completed as part of the Master of Public Policy Program at KDI School of Public Policy and Management.

REFERENCES

1. Ahmed, N. (2020). Consumer protection laws and application: A case study of Pakistan. Journal of Research Society of Pakistan, 57(3).
2. Alam, S., & Haq, M. (2016). Consumer rights and unprecedented mechanism of violation and protection: Bangladesh perspective. European Journal of Business and Management, 8(17)
3. Arefin, A., Arefin, P., Habib, S., & Arefin, S. (2020). Study on awareness about food adulteration and consumer rights among consumers in Dhaka, Bangladesh. Journal of Health Science Research, 5(2), 69–76. DOI: https://doi.org/10.18311/jhsr/2020/25038
4. Balachandran, V., & V, A. K. (2021). A study on Consumer Protection Act 2019 and its implications on the pillars of integrated communication channel. IOSR Journal of Business and Management (IOSR-JBM), 23(9), 59-67. DOI: 10.9790/487X-2309055967
5. BDLex (2024, October 10). Legal regime of consumers' rights protection in Bangladesh. https://www.linkedin.com/pulse/legal-regime-consumers-rights-protection-bangladesh-bdlex-manupatra-r8zvc/
6. Consumers International (2006). https://www.consumersinternational.org/
7. Consumer Rights Protection Act 2009 of Bangladesh.
8. Didwal, A., & Chauhan, R. (2022). Legal and economic perspective of the Consumer Protection Act, 2019 in India: An overview. International Journal of Scientific Research and Management (IJSRM), 10(8), 375-383. DOI: https://doi.org/https://doi.org/10.18535/ijsrm/v10i08.lla01
9. Directorate of National Consumers Right Protection (DNCRP). https://dncrp.gov.bd/
10. Enam, A., Azad, I. I., & Afrin, S. (2024). Exploring online shopping behavior in Dhaka, Bangladesh. Transportation Research Interdisciplinary Perspectives, 25, https://doi.org/10.1016/j.trip.2024.101081
11. Hossain, E. (2020). A focus on the legal framework of consumer protection: Bangladesh perspective. IDEAS International Journal of Literature Arts Science and Culture, 5, 2413-1814.
12. Huq, S. M., Abedin, J., Khatun, S., & Ali, J. (2017). Practices of consumer rights in Bangladesh: A study on Rangpur city. European Journal of Business and Management, 9(7), 2222-2839.
13. Idrees, R. Q., Arfat, Y., & Hussain, N. (2022). Pakistan's current legal regime of consumer protection. Islamabad Law Review, 6(2).
14. Kapoor, H. (2021). Analysis of Consumer Protection Act. Journal of Multi-Disciplinary Legal Research. 2(1).
15. Islam, N., Hassan, M., & Jahan, N. (2016). Consumer rights protection: Degree of awareness and its present status in Bangladesh. European Journal of Business and Management, 8(14).
16. Khan, T., Zakir, M. H., & Iqbal, M. Z. (2023). Comparative analysis of consumer laws in Pakistan and India. Journal of Social Sciences Review, 3(2), 1162-1175. DOI: https://doi.org/10.54183/jssr.v3i2.363
17. Mia, B., & Mallick, S. (2021). Protection of consumers' rights in Bangladesh: Law and reality. International Journal of Law Management & Humanities, 4(3), 4789-4806. DOI: https://doij.org/10.10000/IJLMH.111039
18. Nawaz, F., & Kanwal, N. (2020). Challenges of public policy implementation: A critical analysis of consumer rights protection act in Bangladesh. Journal of Humanities Social Sciences Research, 2(1), 51-60.
19. Negi, C. S., & Kumar, S. (2020). Consumer protection in India: Empowering consumer. International Journal of Development Research, 10(2), 33873–33877.
20. Pakistan Today (2025, August 2). All district consumer courts abolished across Punjab. https://www.pakistantoday.com.pk/2025/08/02/all-district-consumer-courts-abolished-across-punjab/
21. Payments and Commerce Market Intelligence (2024 November). Understanding Bangladesh's E-Commerce Landscape. https://paymentscmi.com/insights/bangladesh-ecommerce-market-insights/
22. Raju, S. S., & Singh, H. K. (2019, October). Consumer Protection Act and its usage in India. In Conference on Consumer Protection Act and its Usage in India, Mahatma Gandhi Central University, Motihari. https://www.researchgate.net/publication/337021161_CONSUMER_PROTECTION_ACT
23. Rizvi, A., Farooqi, M. A., Ramzan, M., Qureshi, H. I. A., & Javed, K. (2023). Consumer protection and protectionism in Pakistan: Regulatory framework, issues and solutions. Journal of Positive School Psychology, 7(1). 1339-1355.
24. Rupam, A. A. (2023). Consumer legal forum of Bangladesh: A comparative study with India and

Pakistan. Law and Society Students' Journal, 1(1). DOI: https://doi.org/10.5281/zenodo.7542857

25. The Consumer Protection Act, 1986
26. The Consumer Protection Act, 2019 (Act No. 35 of 2019)
27. The Economic Times (2025, August 17). Disposal of consumer cases in NCDRC at 122 pc in Jul; 10 states resolve over 100 pc complaints. https://economictimes.indiatimes.com/news/india/disposal-of-consumer-cases-in-ncdrc-at-122-pc-in-jul-10-states-resolve-over-100-pc-complaints/articleshow/123344797.cms?from=mdr
28. The Islamabad Consumers Protection Act 1995
29. The Nation (2025, February 19). Punjab moves to shut down 17 consumer courts amid high costs. https://www.nation.com.pk/19-Feb-2025/punjab-moves-to-shut-down-17-consumer-courts-amid-high-costs?
30. The Punjab Consumer Protection Act 2005
31. The Sindh Consumer Protection Act 2014
32. UN General Assembly Resolution No. 39/248 of 1985. https://www.un.org/esa/sustdev/sdissues/consumption/cppgoph3.htm
33. Voddepally, M., & Reddy, K. R. (2020). Initiatives taken by consumer councils in safeguarding the consumer rights in India- A study. Journal of Research in Business and Management, 8(12), 58-61