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Assessing the Need for a Unified Adjudication Framework for Consumer Protection, Food Safety and Drugs: Perspective Bangladesh

AHMAD RAJIB CHOWDHURY¹ AND HOMAIRA NOWSHIN URMI²

ABSTRACT

Consumers play an important role in the economic chain absorbing the supplies of goods, foods, medicine, service etc. from the suppliers. In this welfare State mechanism, almost all the countries of the world had already enacted legislations for the protection of consumers. Consumer protection includes inter alia, protection relating to the rights of the consumers, food and drugs safety issues, service-related matters. In Bangladesh, we have separate laws and separate adjudication frameworks for consumer protection, food safety and Drugs. It is to be mentioned here that not all of the legislations relating to the matters mentioned above are not in execution in the fullest sense. Separate mechanisms, overriding and concurrent jurisdictions, access to justice mechanism etc, vary in those legislations indicating imbalances and inconsistencies within same subject matters. Hence, we are in need indeed of a combined and unified adjudication framework regarding consumer protection, food safety and drugs in Bangladesh. This article focuses on the need for such unified framework after finding out the loopholes in the frameworks in current legislations thereto. This article also tends to provide a suitable model of such framework.

Keywords: Consumer Protection, Food Safety, Drugs, Consumer Tribunal

I. INTRODUCTION

Consumer protection, food safety, and drug safety are crucial aspects of public health and well-being. Almost all the countries of the world have already enacted consumer protection legislations to protect the recognized rights of the consumers such as right to basic needs, right to safety, right to information, right to choose, right to representation, right to redress, right to consumer education, and right to healthy environment. Food Safety and Drug safety have also encompassed to many matters that separate legislations are commonly available in various countries of the world.

¹ Author is an Assistant Professor at Department of Law, Premier University, Chittagong, Bangladesh.

² Author is an Assistant Professor at Department of Law, Premier University, Chittagong, Bangladesh.

Consumers can be protected through the aspects of voluntary, institutional and statutory mechanisms and legislative framework has been considered the most effective way for ensuring the rights of the consumers.³ In this process Bangladesh has enacted The Consumers' Right Protection Act, 2009⁴ (hereinafter CRPA2009) as the core legislation for protecting the consumers. Later on, Food Safety Act, 2013⁵ (hereinafter FSA2023) was enacted to ensure the rights toward access to safe food for the people of the country. Earlier, we had the Drug (Control) Ordinance, 1982⁶ (hereinafter DO1982) to control manufacture, import, distribution and sale of drugs.

All these three Acts being the core legislations in their respective subject matters (consumer protection, food safety and drugs) have provided remedial framework through adjudication and administrative sanction.

However, these Acts have created some major problems in the adjudication framework in the way of protecting the stakeholders. Concurrent and overriding jurisdictions, anomalies in the types, nature and degree of punishment have been seen throughout these legislations. Some provisions deliberately put obstacles to the consumer's access to justice and provide delay in mechanisms. Some provisions neglect the judicial enforcement giving priority to administrative actions also.

At this outset, its high time to amend such conflicting frameworks as we have been kept waiting for many years. Now we need to find a suitable, single and effective adjudication framework by which consumers can be protected effectively with speedy mechanism.

This article focuses the need for a unified adjudication framework for the protection of consumers, food safety and Drugs. Objectives of the article is to find out the lacunas in current framework of adjudication under the CRPA2009, FSA2013 and DO1982 and to recommend a unified model of adjudication framework that will have sustainable effect in the development of consumer protection mechanism as well as in food safety and Drugs matters.

II. CURRENT FRAMEWORK OF ADJUDICATION UNDER STATUTORY LEGISLATION

At present we see adjudication framework in CRPA2009, FSA2023 and DO1982 respectively for consumer protection, food safety and drugs respectively in the statutes of Bangladesh.

³ Tureen Afroz, 'Consumer Protection Law: Bangladesh perspective', The Daily Star, 18 August 2007, Law and Our Rights, at <http://archive.thedailystar.net/law/2007/08/03/corner.htm>

⁴ The Consumers' Right Protection Act 2009, No. 26, Acts of Parliament, 2009 (Bangladesh).

⁵ The Food Safety Act 2013, No. 43, Acts of Parliament, 2013 (Bangladesh).

⁶ The Drugs (Control) Ordinance 1982, No. VIII, Ordinance, 1982 (Bangladesh).

(A) The CRPA2009

The CRPA2009 has provided three types of grievance procedures i.e. criminal trial⁷, civil suit⁸ and administrative actions⁹ for the offences against the rights of the consumers.

Regarding trial, CRPA2009 enumerates different ranges of acts and omissions as offences and directs punishment for such offences. Offences include in the CRPA2009 are punishment for not using cover of goods, punishment for not showing price-list, punishment for not preserving and displaying price-list of services, punishment for selling goods, medicine or service at higher price than fixed one, punishment for selling adulterated goods or medicine, punishment for mixing prohibited materials in foodstuff, punishment for manufacturing or processing goods in illegal process, punishment for deceiving buyers by false advertisement, punishment for not selling or delivering properly any goods or service promised, punishment for deceiving in weight, punishment for deceiving in weight stone or weight measuring instrument, punishment for deceiving in measurement, Punishment for deceiving in measuring gauge or anything used for measuring length, punishment for making or manufacturing fake goods, punishment for selling any date expired goods or medicine, punishment for doing any act detrimental to life or security of service receiver, punishment for damaging money, health or life etc. of service receiver by negligence, punishment for filing false or vexatious cases.¹⁰

So, it seems that the CRPA2009 has covered varied ranges of offences ranging from pity offence ie. not displaying price list to grave one ie. Damaging life of consumer. Consumer's access to the court has been curtailed and *Locus standi* or right to sue is vested to the director general (DG), being the head of the Directorate of National Consumers' Right Protection (DNCRP).¹¹

The courts of first-class Magistrates or the Metropolitan Magistrates are empowered with exclusive jurisdiction¹² to try consumer offences under the said Act.¹³

CRPA2009 has also provided scope for civil remedies in addition to remedies under criminal prosecution. Section 67 allows the Court to make order for replacing the defective product, repaying money back after the replacement, giving compensations up to five times of the proved damage and cost of the suit.¹⁴

⁷ *Supra* note 4, sec 57.

⁸ *Id.* sec 66.

⁹ *Id.* sec 70.

¹⁰ *Id.* sec 37-54.

¹¹ *Id.* sec 60.

¹² *Id.* sec 57(2).

¹³ *Id.* sec 57.

¹⁴ *Id.* sec 67.

District Magistrate within his local limit or any Executive Magistrate appointed by him enjoys power like the Director General (hereinafter DG) under the CRPA.¹⁵ The DG has been given an extraordinary power to settle consumer offences by imposing administrative fine without resorting to the court of Magistrate.¹⁶ This Act has also provided reward to the complainant with twenty five percent of fine imposed.¹⁷

(B) The FSA2013

Bangladesh has enacted the FSA2013 which was implemented in 2015¹⁸ as the core legislation for the maintenance and preservation of food safety in all relevant areas.

The FSA2013 has also introduced a 3-tier adjudication mechanism for offences detrimental to Food Safety Management System.¹⁹

These include criminal remedy through fine and imprisonment has been introduced along with civil remedies in way of compensation and administrative actions in way of fines. This Act inserts different offences with penalties in its schedule and categorized those offences under section 60²⁰. Consumer's access to justice has been preserved under this Act as any consumer can go directly to the Court for offences enumerated in the schedule.²¹

This Act has provided provisions for setting up Pure Food Court (PFC) under section 64(1)²². This Act however has not provided mandatory provision of separate court stating that the courts of first-class Magistrates or the Metropolitan Magistrates may be designated as PFC and empowered to try offences²³. Twenty five percent of the imposed fine has been awarded to the complainant under section 62 upon conviction under FSA2013²⁴. This Act has also opened scope for any affected person or food consumer to seek additional civil remedies apart from remedies under criminal prosecution to get compensation not exceeding five times of the assessed amount of damage.²⁵ Administrative fine not exceeding taka three lakhs can also be

¹⁵ *Id.* sec 69.

¹⁶ *Id.* sec 70(1).

¹⁷ *Id.* sec 76.

¹⁸ Government of Bangladesh, Ministry of Food. Bangladesh Gazette, S.R.O no. 15-Law/2015 (Jan. 26, 2015), at http://www.dpp.gov.bd/upload_file/gazettes/12473_35267.pdf

¹⁹ *Supra* note 5, sec 13(4)(a). Here food safety management system means the acceptable arrangement of Good Agricultural Practices, Good Aqua-cultural Practices, Good Manufacturing Practices, Good Hygienic Practices during food production, processing, preparation and marking of safe and healthy foods, Hazard Analysis, Food Safety Emergency Response, Residual Control System and Food Safety Auditing System and practice of relevant subjects which exist in the approved guidance or directives issued for carrying out food business to ensure the compliance of the standards and obligations prescribed by the existing laws.

²⁰ *Id.* sec 60.

²¹ *Id.* sec 66(3).

²² *Id.* sec 64(1).

²³ *Id.* sec 64(2).

²⁴ *Id.* sec 62.

²⁵ *Id.* sec 76.

imposed in case of allegation on purity of any food by any person under section 78 of FSA2013.²⁶

(C) The DO1982

The Drugs (Control) Ordinance, 1982 has provided for Drug Court²⁷ to try offences like manufacturing unregistered, adulterated, misbranded, spurious drugs (16), sub-standard drugs²⁸, importing drugs without authorization²⁹, selling medicine or pharmaceutical raw materials at higher price³⁰, theft of government drugs³¹, illegal advertisement and claim³² etc. *Locus standi* here is vested to the licensing authority.³³

III. PROBLEMS IN THE CURRENT FRAMEWORK WITH POSSIBLE SOLUTIONS THERETO

The CRPA2009, FSA2013 and DO1982 remain as core legislations regarding consumer protection, food safety and drugs respectively. All these acts have some common provisions to deal with under different frameworks. We can point out the problems in the current frameworks under following heads:

(A) Neglected vision to consumer's access to justice

Consumers don't have equal protection and access to justice under current frameworks under the said Acts. In CRPA2009, consumers can not go directly to the court³⁴. Under DO1982, consumers do not have such access too.³⁵ Such denial of right to sue can be in contradiction to the Constitution of Bangladesh³⁶ stating in its article 27 that all citizens are equal before law and are entitled to equal protection of law. FSA2023 however provided provisions for the aggrieved consumers to go directly before the court for remedy under trial³⁷. So, we can conclude that consumer's access to justice must not be curtailed and they must be given opportunity to go the court directly regarding offences committed against him/her. A single system of adjudication framework can provide for such access easily.

²⁶ *Id.* sec 78.

²⁷ *Supra* note 6, sec 23.

²⁸ *Id.* sec 17.

²⁹ *Id.* sec 18.

³⁰ *Id.* sec 19.

³¹ *Id.* sec 20.

³² *Id.* sec 21.

³³ *Id.* sec 22.

³⁴ *Supra* note 4, sec 60.

³⁵ *Supra* note 6, sec 22.

³⁶ The Constitution of the People's Republic of Bangladesh, 1972 (Bangladesh).

³⁷ *Supra* note 5, sec 66(3).

(B) Concurrent jurisdiction

As consumer protection includes *inter alia* food safety and drugs safety, it is evident that the three above mentioned Acts do have same and concurrent jurisdiction over same matter at the same time. For example, we can find same provisions regarding punishment for selling goods, medicine or service at higher price than fixed one in CRPA2009³⁸ and DO1982³⁹, punishment for mixing prohibited materials in foodstuff in CRPA2009⁴⁰ and FSA2013⁴¹, punishment for selling adulterated goods or medicine in CRPA2009 for goods or medicine⁴², in FSA2013 for food⁴³ and in DO1982 for drugs⁴⁴, punishment for selling any date expired goods or medicine in CRPA2009⁴⁵ and in FSA2013⁴⁶, punishment for not using proper guideline in CRPA2009⁴⁷ and in FSA2013⁴⁸, punishment for deceiving buyers by false advertisement in CRPA2009⁴⁹, in FSA2013⁵⁰ and in DO1982.⁵¹ We can hence recommend for combined list of offences to be tried under a single adjudication framework to avoid multiplicity of proceedings and concurrent jurisdiction.

(C) Varied remedies for same nature of offence

Criminal remedies seem different in some of the same provisions under the CRPA2009, FSA2013 and DO1982. Some other Acts do have same provisions apart from the above three Acts. For example, section 25(c) of the Special Powers Act, 1974⁵² provides death penalty as highest penalty for adulteration of, or sale of adulterated food, drink, drugs or cosmetics. CRPA2009 has provided application of this section as the punishment only for medicine⁵³ whereas FSA2013 provides imprisonment of 3 years and/or fine of taka not more than 6 lacs for same offence.⁵⁴ For another instance, the CRPA2013 has provided imprisonment of 3 years and/or fine of taka not more than 2 lacs as punishment for selling adulterated goods⁵⁵ whereas

³⁸ *Supra* note 4, sec 40.

³⁹ *Supra* note 6, sec 19.

⁴⁰ *Supra* note 4, sec 42.

⁴¹ *Supra* note 5, sec 23.

⁴² *Supra* note 4, sec 41.

⁴³ *Supra* note 5, sec 25.

⁴⁴ *Supra* note 6, sec 16.

⁴⁵ *Supra* note 4, sec 51.

⁴⁶ *Supra* note 5, sec 29.

⁴⁷ *Supra* note 4, sec 37.

⁴⁸ *Supra* note 5, sec 32(a).

⁴⁹ *Supra* note 4, sec 44.

⁵⁰ *Supra* note 5, sec 32(b).

⁵¹ *Supra* note 6, sec 21.

⁵² The Special Powers Act 1974, No. XIV, Acts of Parliament, 1974 (Bangladesh).

⁵³ *Supra* note 4, sec 72.

⁵⁴ *Supra* note 5, sec 25.

⁵⁵ *Supra* note 4, sec 41.

FSA2013 provides imprisonment of 3 years and/or fine of taka not more than 6 lacs.⁵⁶

Moreover, the degree or duration of sentence may create some discrepancies also when we will find that causing consumer's death by negligence or any detrimental act will result in an imprisonment not exceeding three years or fine not more than taka two lacs or both in CRPA2009.⁵⁷ This type of sentence is seemed to be unethical as such offences amount almost to a murder. Some more offences like causing environmental degradation through industrial pollutions and dumping, making artificial rise of the price of essential consumer goods through syndicated cut of supply etc. should be inserted to ensure a wide range of protection for the consumers.

So, we are indeed in the need of formulating a single framework of adjudication with supplementing definitions and punishments all offences regarding consumer protection, food safety and drugs in all other Acts in operation.

(D) Delayed system of adjudication

One of the underlying problems in current frameworks is that designated courts to try offences and give civil remedies are not special courts appointed for that purpose only. These Courts are general courts and have been entrusted with extra responsibilities to try offences or give remedies on various matters. Such approach surely is delaying the judicial process where consumers can not expect speedy remedy. According to a recent report of the Law Commission of Bangladesh, our judiciary is said to be crippled with vicious cycles of delays with 4.2 million pending cases having 1 judge for every 95000 citizens.⁵⁸

Apart from such problems, CRPA2009⁵⁹ and FSA2013⁶⁰ have provided scope for civil remedies in a separate general court after criminal conviction is final. Consumers have been set to have further delay for claiming compensation after conviction is final in the trial. It clearly violates the notion of speedy justice in consumer disputes including food safety and drugs. So, a separate and special court only appointed to deal with the offences of the said type and to give civil remedies can give speedy justice to the consumers.

(E) Preference for administration rather than judicial verdicts regarding declared offences

⁵⁶ *Supra* note 5, sec 25.

⁵⁷ *Supra* note 4, sec 52 and 53.

⁵⁸ Tribune Editorial, *Justice delayed is justice denied: Bangladesh's judicial crisis is a pressing issue*, Dhaka Tribune, 01 September 2023, at <https://www.dhakatribune.com/opinion/editorial/324142/justice-delayed-is-justice-denied>

⁵⁹ *Supra* note 4, sec 66(1).

⁶⁰ *Supra* note 5, sec 76.

CRPA2009 does not provide any strict responsibility on the DG to file a case to the court of Magistrate. Section 61 stipulates that the Magistrate shall not take cognizance of any offence if charge-sheet is not submitted within ninety days of complaint made by the consumer to the DG.⁶¹ Moreover, the DG have alternative ways to settle dispute through imposition of administrative fine not going to the regular filing of prosecution to the Court of Magistrate.⁶² So, we see that access to judicial remedy of declared offence can be blocked by DG being a person from the administration.

This type of restraint must be removed as it bypasses or neglects the formal judicial mechanism. FSA2013 however excluded some sections not be remedied by administrative actions.⁶³ But report of Bangladesh Food Safety Authority says that executive magistrates are prosecuting offenders under the said Act.⁶⁴ This is also a clear violation of separation of judiciary effective from 01 November 2007.

(F) Discrepancies as to the nature of offence

All offences under CRPA2009 have been made bailable, cognizable and compoundable.⁶⁵ FSA2013 has categorized all offences separately with a schedule and DO1982 has made all offences as non-cognizable.⁶⁶ There should be proper categorization of offences under an annexed schedule recognizing the grave type of offences as non-bailable and non-compoundable to make a harmonized system.

(G) Anomalies regarding time limit

Generally, law of limitation doesn't apply to criminal cases but we have seen provisions to fix timeframe of 30 days for complaint under the CRPA2009⁶⁷ and FSA2023.⁶⁸ However, time of appeal against criminal conviction and appeal against civil judgement have been set to 60 days in CRPA2023⁶⁹ and 30 Days in FSA2023⁷⁰ and 90 days in both Acts⁷¹ respectively. DO1982 doesn't provide any time limit of appeal.⁷² So, we can see that the consumers have only 30 days

⁶¹ *Supra* note 4, sec 61.

⁶² *Id.* Sec 70(1);

⁶³ *Supra* note 5, sec 78(6).

⁶⁴ Bangladesh Food Safety Authority [BFSA], 2023 *Mobile Court Report* (2023), http://bfsa.gov.bd/sites/default/files/files/bfsa.portal.gov.bd/files/2a32cb5c_5ca2_4da0_b8cf_4bd2fea97781/2023-07-19-04-37-c438227a5332b98a3053a48ec64563a1.pdf

⁶⁵ *Supra* note 4, sec 59.

⁶⁶ *Supra* note 6, sec 22(a).

⁶⁷ *Supra* note 4, sec 60.

⁶⁸ *Supra* note 5, sec 66(3).

⁶⁹ *Supra* note 4, sec 65.

⁷⁰ *Supra* note 5, sec 74.

⁷¹ *Supra* note 4, sec 68 and *supra* note 5, sec 77.

⁷² *Supra* note 6, sec 23(8).

to complain and it is not acceptable at all. Consumers can face delay due to illness, collection of documents etc. and such matters had not been taken into consideration. The Acts moreover provided 60 to 90 days for appeal specially for the accused parties which is more favourable. So, there must be uniformity in the time limit of appeal and complaints.

(H) Benefits of a unified system of adjudication hence unveiled

If we consider things discussed above, we cannot deny that a unified system of adjudication can provide expected benefits to the consumers. We can summarize the following benefits of a single adjudication framework:

Firstly, acts or omission regarded as offence under consumer protection, food safety or drugs can be inserted as supplemental provision to all other legislations in execution for the time being. It will help harmonizing the list of offences in the same footing. There will be no more overriding or concurrent jurisdictions.

Secondly, fixed and separate court can render speedy justice to the parties of the dispute of said types. Special tribunals do have powers to give civil, criminal remedies at the same time. It can also give reparation while conviction. Consumers will get speedy justice and proper remedy without harassment and delay under such special courts or tribunals if formed. In section 61 of FSA2013, it has already stated that in order to ensure effective trial, case can also be filed before the special court or the special tribunal or under this Act wherever necessary. So, there will be no bar to designate a special court or tribunal to try offences under the said three Acts.

And finally, rights of the consumers can be protected and preserved close to the expected level by such unified framework. It will help establishing more consumer-friendly environment with satisfaction of the consumers when they will see that their grievances are properly heard and they are getting speedy remedies.

IV. RECOMMENDING A UNIFIED MODEL OF ADJUDICATION FRAMEWORK FOR BANGLADESH

Rationale lies in favour of unified model of adjudication framework in the need for consumer friendly and speedy justice mechanism with minimum time waste. Such single and unified framework shall provide easy access to justice to the consumers. Consumers will be well aware of their rights and grievance procedures when they feel that they stand with a good chance with minimal use of time and money in litigation.

We can recommend a “Special Tribunal of Consumer Dispute” which will have jurisdiction to try offences under the CRPA2009, FSA2013 and DO1982. A proviso in the Act of Tribunal

shall stipulate that this Tribunal shall have sole jurisdiction to try offences under the said three Acts or similar types of offences.

This tribunal shall have both criminal and civil jurisdiction so that it can give compensation to the consumers just after conviction in the same judgement. Time limit of investigation should be limited to 2 months and in extra-ordinary situation, 1 month can be added with the approval of the Tribunal.

Consumers shall have direct access to the Tribunal and can file case directly to the Tribunal with reasonable time limit. Pity offences will be categorized and defined where no harms are presumed to be done to the consumers such as not displaying price list of good or service, giving defective products of lower value etc. Such pity offences can be tried under quasi-judicial bodies formed by the government which will be supervised by the Tribunal. In India, Consumer Protection Act, 2019⁷³ has provided for quasi-judicial redressal bodies in District levels in section 28(1) from where appeal lies to State Commission⁷⁴ and from State Commission to National Commission respectively.⁷⁵ These Redressal bodies have been very effective in India with consumer dispute. We can form such bodies to deal with pity offences with quasi-judicial manner within fixed time limit. Labour Act, 2006⁷⁶ of Bangladesh has already provided for such quasi-judicial set up for speedy disposal of labour disputes. In this point, Law Commission Bangladesh's 'Proposal for the enactment of Consumer Protection Act, 2000'⁷⁷ can be given as example where it had proposed District Consumer Tribunals and National Consumer Tribunals. Imposing mandatory Alternative Dispute Resolution (ADR) under the CRPA can also be a proper way to curtail the overload of dispute. Such provision in the Act of proposed tribunal as well as compulsory negotiation and medication in the proposed redressal bodies can give good result also.

V. CONCLUSION

Bangladesh is highly in need of an effective consumer protection mechanism which will deal exclusively relevant issues like food safety and drugs too. It has been 13 years after the enactment of CRPA2009 as the core consumer law and this law along with FSA2013 and DO1982 are not creating any momentum into speedy and effective remedial mechanism. Adopting a unified adjudication framework will surely help the consumers in getting adequate

⁷³ The Consumer Protection Act 2019, No. 35, Acts of Parliament, 2019 (India).

⁷⁴ *Id.* Sec 41.

⁷⁵ *Id.* Sec 51.

⁷⁶ Bangladesh Labour Act 2006, No. XLII, Acts of Parliament, 2006 (Bangladesh).

⁷⁷ Law Commission Bangladesh, 2000 Proposal for the enactment of Consumer Protection Act, 2000 (2000), <http://www.lawcommissionbangladesh.org/reports/33.pdf>

remedies within shortest possible time. Government should consider framing such unique and unified framework to be in line with the mandate to rule the people under democracy.

VI. REFERENCES

- Tureen Afroz, 'Consumer Protection Law: Bangladesh perspective', The Daily Star, 18 August 2007, Law and Our Rights, at <http://archive.thedailystar.net/law/2007/08/03/corner.htm>
- The Consumers' Right Protection Act 2009, No. 26, Acts of Parliament, 2009 (Bangladesh).
- The Food Safety Act 2013, No. 43, Acts of Parliament, 2013 (Bangladesh).
- The Drugs (Control) Ordinance 1982, No. VIII, Ordinance, 1982 (Bangladesh).
- Government of Bangladesh, Ministry of Food. Bangladesh Gazette, S.R.O no. 15-Law/2015 (Jan. 26, 2015), at http://www.dpp.gov.bd/upload_file/gazettes/12473_35267.pdf
- The Constitution of the People's Republic of Bangladesh, 1972 (Bangladesh).
- The Special Powers Act 1974, No. XIV, Acts of Parliament, 1974 (Bangladesh).
- Tribune Editorial, *Justice delayed is justice denied: Bangladesh's judicial crisis is a pressing issue*, Dhaka Tribune, 01 September 2023, at <https://www.dhakatribune.com/opinion/editorial/324142/justice-delayed-is-justice-denied>
- Bangladesh Food Safety Authority [BFSA], *2023 Mobile Court Report (2023)*, http://bfsa.gov.bd/sites/default/files/files/bfsa.portal.gov.bd/files/2a32cb5c_5ca2_4da0_b8cf_4bd2fea97781/2023-07-19-04-37-c438227a5332b98a3053a48ec64563a1.pdf
- The Consumer Protection Act 2019, No. 35, Acts of Parliament, 2019 (India).
- Bangladesh Labour Act 2006, No. XLII, Acts of Parliament, 2006 (Bangladesh).
- Law Commission Bangladesh, 2000 Proposal for the enactment of Consumer Protection Act, 2000 (2000), <http://www.lawcommissionbangladesh.org/reports/33.pdf>
