



Business practices in South Africa during Covid 19 that impact consumers' economic means



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ABSTRACT

Objective – COVID-19 brought about devastating economic consequences across the globe. The outbreak and spread of this disease, coupled with supply-side constraints, led to sudden increases in prices by some businesses that managed to access products.

Methodology/Technique - This paper outlines a qualitative analysis of consumer protection cases filed between April 2020 and March 2021 at the National Consumer Tribunal of South Africa. Consumer protection agencies play a central role in ensuring consumers' welfare, which is more accentuated in times of the Covid 19 pandemic and its aftermath.

Findings – Results of the analysis of the contents of the cases show that South African consumer protection agencies acted with agility in line with their regulatory responsibilities. The cases examined in the study indicated that due to the relatively few cases able to be adjudicated, the National Consumer Tribunal had limited opportunity to contribute to the deeper consideration of the definitional development of the preventative intentions of the law in this regard. However, the Tribunal applied its mind to the definition of unfair pricing to respect consumers' rights in this regard.

Novelty - The work of the Tribunal in interpreting necessary consumer rights to fair, reasonable, and just pricing is thus a lasting contribution to ensuring the realisation of these rights. In cases where businesses that were found to have not complied with the Regulations and were found to have engaged in prohibitive conduct and duly fined, it sends a strong message to businesses that the violation of consumer rights will not be tolerated, even in complex circumstances such as during the Covid 19 pandemic.

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1. Introduction

As the global coronavirus (Covid 19) pandemic played out worldwide, problematic business practices and misinformation were rife. Consumers had to adjust their purchasing behaviour and migrate to new ways of buying goods and services through online and e-commerce platforms.

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Consumer protection agencies acted responsively by taking definitive action and looking for new ways to share best practices and address these issues. Despite the human suffering and the economic crisis brought about by Covid 19, some took the opportunity to profit from the chaos and misfortune of others. This has opened yet another dimension in the battle against a global virus: how to protect consumers and safeguard their rights. It is in this regard that Consumer protection agencies around the world become central players in this battle. What are the situation in South Africa and the African context? This paper explores nine South African National Consumer Tribunal (NCT) cases to provide insight into consumer issues addressed during the pandemic and propose a way forward. Pricing of products is a significant decision for any business. During the Covid 19 pandemic, the South African Government demonstrated commitment to attending to and resolving consumer protection issues. The Consumer Protection Act No. 68 of 2008 (the CPA) gives consumers clear rights. In response to the economic implications of the Covid 19 pandemic, the South African Government issued regulations under the Disaster Management Act dispensation. Certain of these regulations specifically addressed consumer protection, notably the Consumer and Customer Protection and National Disaster Management Regulations and Directions (in the future referred to as "CCP and Disaster Management Regulations") (Gazette, n.d.).

Protecting consumers from business practices that would impact their economic means was of particular importance. The regulations aimed to limit markups on goods and services to ensure that consumers were protected from unconscionable, unfair, unreasonable, and unjust price increases. This is known as price gouging. Suppliers were prohibited from effecting such price increases, which would set the net margin or markup on goods or services above the average margin or markup for those goods or services in the three months prior to the start of the pandemic. However, it is unclear whether the introduction of these regulations provided the intended protection for consumers; and whether or not businesses not complying with the regulations were brought to book and held to account if they exploited consumers through price gouging. This behaviour would have impacted the already precarious economic circumstances of consumers, many of whom had lost their jobs and means of income due to the economic contraction brought about by the pandemic. The impact would have been more harmful to vulnerable consumers, whose economic livelihoods are perpetually on the margins, and who have limited access to redress when businesses do not respect their consumer rights.

Research is thus needed to explore the response to the promulgation of the CCP and Disaster Management Regulations during the pandemic. The main objective of this research is to explore the cases that were filed between April 2020 and March 2021 at the National Consumer Tribunal since the publication of the CCP and Disaster Management Regulations in March 2020 in South Africa. The intention was to see whether prohibited business practices were indeed investigated and appropriately dealt with in terms of the provisions in the Regulations. This paper first outlines a literature review on consumer rights and pricing practices; after that, the research method is described, and the results of the study, as well as conclusions and implications, are provided.

2. Literature Review

Consumer rights are a global phenomenon. The manner in which consumer rights are defined, interpreted, and applied may differ from country to country, depending on the levels of economic development of a country or economic region. However, the introduction and spread of e-commerce have resulted in governments worldwide recognising the need to co-operate around consumer protection as consumers transact across sovereign geopolitical borders. The United Nations Guidelines on Consumer Protection (UNCTAD, 2021), adopted in 1985 and amended extensively in 1999 and again in 2015, indicate a joined-up and internationalised approach to consumer protection. At a national level, different countries have established regulatory mechanisms and institutional structures such as consumer protection agencies and Tribunals for promoting and ensuring compliance with consumer protection legislation. Given the global

nature of commerce and related consumer participation, regional cooperative networks such as the African Dialogue Platform are also in place. Multi-national structures such as the Organization for Economic Co-operation and Development (OECD). Regional collaborative engagement platforms such as the Association of South-East Asian Nations (ASEAN), the Middle East/North African States (MENA), and the Latin American States increasingly engage collaboratively on consumer policy and consumer protection issues. In response to the greater visibility of consumer rights and consumer protection, the United Nations Conference on Trade and Development (UNCTAD) annually convenes the Intergovernmental Group of Experts (IGE) on Consumer Protection. The IGE is spearheading the implementation of peer review processes to strengthen consumer protection practices in countries and to offer lessons of good and best practices for other countries to learn from. The global prominence of consumer protection and rights has stimulated an increasing interest among researchers, public policy scholars, consumer organizations, and social formations, with a resultant body of knowledge. There is an active debate on the extent to which consumer protection policy and regulatory frameworks are sufficiently extensive to ensure the promotion and protection of consumer rights and explore the effectiveness of redress mechanisms.

Every consumer has a legitimate expectation of enjoying consumer rights such as the right to safety, the right to be heard, the right to satisfy basic needs, the right to get information about goods and services, the right to consumer education, the right to redress, to enjoy a healthy market environment, the right to choose and the right to fair and honest dealings. Table 1 provides an overview of the literature on consumer rights and consumer protection (Best & Struwig, 2020) (Boshoff, 2020) (Rajanikanth, 2017) (Singh et al., 2014).

Table 1. An overview of the literature on consumer rights and consumer protection

Author and date	Main finding
Best & Struwig (2020)	Explores African online business practices that enable consumer protection. It applied 13 online practices to 235 websites to investigate online business practices.
Boshoff (2020)	Explains excessive pricing policies in South Africa and distinguishes between price gouging and excessive pricing.
Kanipakam (2017)	Consumers should get value for their money through quality goods and better services. Although modern technology has assisted in this, consumers are still victims of unfair and restrictive trade practices.
Koteswar (2017)	All customers are purchasing products and whereafter some then observe defects in quality. Most customers reject the product and complain about it, and they are not aware of the Consumer Protection Act and do not get the response and redress they want timeously.
Rajanikanth (2017)	There is increasing awareness of consumer rights. Consumers are slowly losing interest in redress mechanisms as remedies that provide insufficient legal protection.
Devi (2016)	Consumer rights indirectly are human rights, and a fully-fledged recognition of consumer rights is necessary, to ensure adequate protection.
Singh, Bery, Biswas & Aggarwal (2014)	Public awareness about medical negligence has increased and suggests doctors should update their understanding of the Consumer Protection Act.

Source: Author's compilation

The Covid 19 pandemic affected consumers globally, requiring a change in consumer and business practices. (Arora et al., 2020) surveyed 45 countries to establish consumer sentiment and behaviour. The survey results show that the social and economic practices that had to be adjusted during the Covid 19 pandemic, have had a marked impact on consumer behaviour. These changes look set to become how consumers exercise their shopping and consumption choices. Consumer rights, as an expression of principles, remain applicable in the new purchasing modes that the survey reported. However, the extent to which consumer protection policy, regulations and redress mechanisms that were in place before the pandemic, remain practical and implementable, needs further examination. The coronavirus pandemic created

overwhelming needs. First, above all else, are the dire health problems threatening the lives of so many people. The second deals with the fallout in the economy from the abrupt halt to much business activity locally and globally. But a third crucial need, which follows closely on the heels of the second, is to shield households and families from the direct economic harm they face.

Five pricing practices can influence businesses: price-fixing, where there is an agreement to buy or sell at a fixed price, or bid rigging, where a bid is given to one group while it appears as many could bid. Price discrimination is selling the same product at different prices to different groups, whereas price skimming is where a product is first sold at a high price and then gradually at a lower price. Monopoly gouging, on the other hand, is charging a much higher price than one matching the product's value.

3. Research Methodology

According to (Bryman & Bell, 2008), (Cooper & Schindler, n.d.), (Easterby-Smith, M., Devi, 2016), and (Marshall & Rossman, 2006), the qualitative research strategy is the best approach to telling the researcher how and why events occur as they do. (Bryman & Bell, 2008) added that qualitative research strategy uses informative methods to describe, decode, and translate the meaning, not the frequency, of particular phenomena that are naturally happening in the social world. (Creswell & Creswell, 2014) indicates that qualitative research is an approach to exploring and understanding problems. This research uses a qualitative study collecting and analysing consumer protection cases that were filed at the National Consumer Tribunal since the introduction of the CCP and Disaster Management Regulations to ensure consumer protection during Covid 19 in South Africa.

Only nine cases could be found that were filed between April 2020 and March 2021 at the NCT since the publication of the CCP and Disaster Management Regulations in March 2020. The nine cases that dealt with consumer protection and constituted the data collection for the research were downloaded from the websites of the National Consumer Tribunal [www.thenct.org.za] and the Southern African Legal Information Institute [www.saflii.org]. A research protocol was developed to analyse the cases and includes the case's background, the type of case, a brief overview, and the outcome.

The researcher ensured the credibility of the study's data by relying on the expertise of experienced researchers and adhering rigorously to the study procedures as set out in the research protocol. The transferability of the study was ensured by using multiple sources of information in the form of academic research publications. The data's dependability depends on the triangulation of methods and the provision of an audit trail to test the accuracy of the information translations from the data sources (Chilisa et al., 2012). The study did this by providing an audit trail of the research process. The confirmability of the study concerns ensuring that the findings are grounded in the data rather than being of the researcher's construction (Chilisa et al., 2012). The study did this by self-monitoring on the part of the researchers throughout each phase of the study to restrict and monitor biases. The rigor of the study was of critical importance. The extent to which the study could be considered scientific and empirical relies on the rigorous nature of the study. The expertise of the principal researcher and the provision of an auditing trail was of key importance throughout the study and played a major role in ensuring research rigour.

4. Results

The results of the nine cases used in this study are summarised in Table 2.

Table 2. A summary of the results of the nine cases

Case	Contravention or Allegation	Outcome of Case	Points of Interest for Consumer Protection Policy
Case 1:	Alleged the business	Prohibited	The judgment provides a specific

Case	Contravention or Allegation	Outcome of Case	Points of Interest for Consumer Protection Policy
Workwear manufacturer	increased the sale prices despite the initial cost of masks remaining the same.	conduct was found, and the business was fined R100 000.	definition of what constitutes unfair pricing.
Case 2: Pharmacy	Alleged that price-gouging took place by the business increasing prices to levels much higher than considered fair and reasonable, to the detriment of consumers.	Case withdrew by the Applicant – the National Consumer Commission (NCC).	Although price-gouging is not a new concept, the manifestation is unique in South Africa because it was being invoked during a time of extreme economic difficulty for consumers during a pandemic.
Case 3: Pharmacy	Use unfair tactics in connection with the marketing of face masks and increase the price of the face masks above the average margin or product markup.	Case withdrew by the Applicant – the NCC.	The NCC sought an order from the Tribunal declaring that the business engaged in prohibited conduct due to repeated contraventions of the CPA and Disaster Management Regulations.
Case 4: Chemical manufacturer	It is supplying goods at a price that is unfair, unreasonable, or unjust.	Unable to find that the business engaged in prohibited conduct due to lack of evidence.	For all consumers to be afforded the intended protection under the CPA and the Regulations, consumer protection agencies require the capacity and expertise to collate evidence and to prepare and present well-constructed arguments predicated on sound investigative proof to prove price increases to be unfair, unreasonable or unjust; as well as to prove what constitutes unfair, unreasonable or unjust behaviour on the part of the business.
Case 5: Workwear manufacturer	It is supplying goods at prices that are excessive, unconscionable, unfair, unreasonable, and unjust.	Case withdrew by the Applicant – the NCC.	Had the case been heard, a point of legal interest would have been defining the importance of transparent pricing, which is of critical benefit to the unwitting consumer.
Case 6: Pharmacy	It is supplying goods at prices that are excessive, unconscionable, unfair, unreasonable and unjust.	Case withdrew by the Applicant - the NCC.	The Applicant (the NCC) proposed the imposition of a fine if price gouging was found. This would have been a definitive redress mechanism and underscored the need for business compliance with consumer protection policy imperatives.
Case 7: Safety products supplier	Supplying goods at prices that are excessive, unconscionable, unfair, unreasonable and/or unjust	Unable to find that the business engaged in prohibited conduct based on the evidence or rather lack thereof, presented by the Applicant – the NCC.	For all consumers to be afforded the intended protection under the CPA and the Regulations, consumer protection agencies require the capacity and expertise to collate evidence and to prepare and present well-constructed arguments predicated on sound investigative proof to prove price increases to be unfair, unreasonable or unjust; as well as to prove what

Case	Contravention or Allegation	Outcome of Case	Points of Interest for Consumer Protection Policy
			constitutes unfair, unreasonable or unjust behaviour on the part of the business.
Case 8: General dealer/supplier	It is supplying goods at prices that are excessive, unconscionable, unfair, unreasonable and/or unjust.	Case postponed and then withdrawn by the Applicant - the NCC.	Parties negotiated a settlement agreement, and there was therefore no further basis for NCT to hear the matter. There are differing views as to whether settlement orders can be made orders of Tribunals, to ensure enforcement in the event of non-compliance.
Case 9: Grocery outlet	Supplying goods at a price that is unfair, unreasonable, or unjust.	Condonation Ruling allows for the Respondent's Late Filing of Answering Affidavit (the grocery outlet).	The matter was in all likelihood settled outside the NCT through a settlement agreement between the parties. The act of filing a matter at the Tribunal can serve as a trigger for engagement between the parties. This in turn leads to the settlement of matters, to the benefit and the interest of consumers and businesses.

Considering all the cases outlined in Table 2, the NCT issued judgments in three of the nine cases brought by the National Consumer Commission (NCC) regarding the CCP and Disaster Management Regulations. In only one of these three cases, a business was found to have engaged in prohibited conduct. It contravened the CCP and Disaster Management Regulations specifically introduced during the Covid 19 pandemic to protect consumers from price gouging by supplying unfair, unreasonable, or unjust goods. As a preventative measure and as a message to the broader business community, the business that contravened the Regulations was also ordered to pay the penalty. In the other two matters adjudicated, the NCT had limited opportunity to contribute to the deeper consideration of the definitional development of the preventative intentions of the law, due to insufficient proof of contraventions being provided by the NCC. Six of the cases were withdrawn by the NCC. When withdrawing a case, the party that brought the case is not obliged to provide reasons for this. It is likely that in a number of these cases, the NCC entered into negotiations with the businesses concerned with settling the matters through binding agreements. This is an effective mechanism for preventing the abuse of consumers. However, the impact of this protection is only applicable to the business that is a party to the settlement agreement, as the agreements do not create a legal precedent that other businesses must heed and amend their business practices accordingly. Settlement agreements are also not of public record and thus do not serve as a deterrent to the broader marketplace.

These results are in line with (Ratshisusu & Mncube, 2020), who indicated that for the two weeks following the declaration of the State of National Disaster, the Competition Commission (the 'Commission') received a total of 559 complaints. Approximately 250 of these relate to matters that fall outside the Competition Act's scope and the applicable regulations. The balance of the complaints was against retailers and suppliers for charging excessive prices for products related to COVID-19 essentials. The majority of the complaints related to hand sanitisers and face masks, followed by toilet paper, flu medication, and other products (Ratshisusu & Mncube, 2020).

5. Discussion

Results of the analysis of the contents of the cases led to the following observations and conclusions:

5.1 Policy and Regulatory Agility within Judicial Principles

The South African Government swiftly introduced regulations to protect consumers from exploitation due to excessive prices being charged for essential items such as hand sanitizers, and personal protective equipment needed to ensure consumer safety during the pandemic. The regulations empowered the NCC to investigate alleged instances of businesses not complying with these regulations and increasing prices excessively to the detriment of consumers. Despite the problematic prevailing health and safety circumstances due to the pandemic, the NCC conducted investigations and filed cases with the NCT to protect consumer rights.

Similarly, the NCT adjusted its business practices and introduced online adjudication platforms to enable the consideration of cases filed before it. A number of the cases examined during the research were not adjudicated to completion means that consumers are still vulnerable to exploitative pricing if these practices continue. However, the NCT is bound by judicial procedures of fairness and due process and cannot insist on a case continuing if it is withdrawn by the party or entity that filed the case in the first place. These principles must be abided by if the integrity of the NCT is to be maintained. This is critical for its ability to adjudicate with authority on consumer protection matters beyond the pandemic.

5.2 Development of consumer protection intentions of the law: unconscionable conduct, unfair, unreasonable, and unjust prices

With regards to unconscionable conduct, the CCP and Disaster Management Regulations reiterate the provisions of sections 40 and 48 of the Consumer Protection Act (CPA), which provide that a supplier may not engage in unconscionable conduct, including the use of unfair tactics in marketing and supplying goods or services to a consumer. They may not offer to or provide any good or service at an unfair, unreasonable or unjust price. These are very powerful legal tools to protect consumers from business practices of this nature. Since the introduction of the CPA more than ten years ago in 2008, there has been a disappointing lack of vigour in applying these concepts in jurisprudence to flesh out the meaning and complete interpretation thereof. Bringing legal meaning and content has the ability to serve as a very real and powerful deterrent to businesses to steer clear of business practices that exploit consumers in this way.

The cases examined in the study show that there was a limited conceptual contribution to the deeper consideration of the definitional development of the preventative intentions of the law. This is due to several cases being withdrawn by the Applicant (the NCC). As a result, the NCT could not consider and deliberate on the meaning and legal interpretation of the concept of price gouging. Regarding unreasonable and unjust prices, the findings of the case analysis during the research show that the NCT applied its mind to the definition of unfair prices, in the interest of respecting consumers' rights in this regard. The CCP and Disaster Management Regulation 5.2 defines what constitutes unfair pricing and the specific goods to which this applies. However, when considering the allegations of unfair pricing, the NCT found that no such definition existed prior to the introduction of the Regulations in March 2020. It was further found that there is no evidence of this standard being applied previously. As a result, it was ruled that it was possible that no supplier would have been aware that increasing their prices in this manner was prohibited. The NCT provided the beginnings of questions to be posed in future determinations of what may constitute unfair pricing.

5.3 Capacity and Expertise of Consumer Protection Agencies

Consumer protection agencies are at the forefront of promoting and protecting consumer rights. A vital component of entrenching consumer protection results from agencies filing strong and convincing cases for adjudication by courts and Tribunals. Judicial rulings and judgments are powerful tools to confirm consumer rights and hold businesses to account to ensure fair business practices toward consumers. Consumer protection agencies need to be adequately resourced and have the requisite capacity and expertise to

investigate consumer complaints and allegations of contraventions by businesses. Without this capability, watertight cases based on solid evidence backed up by proof of contraventions are not likely to be well prepared and filed. This impedes courts and Tribunals' ability to make definitive rulings that strengthen, entrench, and enable consumer protection. Consumers must also be aware of their rights and feel empowered to bring complaints to protection agencies for investigation. The CPA remains the primary legislative tool for consumer protection in South Africa. However, the CCP and Disaster Management Regulations will be of no force and effect when the Covid 19 outbreak is no longer declared a disaster. NCT judgments remain valid and inform future legal decision-making going forward. The work of the NCT in interpreting necessary consumer rights to fair, reasonable, and just pricing, is thus a lasting contribution to ensuring the realisation of these rights. More cases are, however, required to give fuller meaning to the concept of unconscionable conduct.

Adequate consumer protection depends on the related activities of the Government, businesses, and consumers. The Government is responsible for providing an enabling and enforceable policy environment, including practical and efficient redress avenues. Consumers need to know their consumer rights and feel confident and empowered to claim their rights and seek redress. Businesses must comply with consumer protection legislative requirements and implement measures to ensure business practices are designed accordingly. The relatively few cases filed with the NCT may indicate that businesses complied with the CCP and Disaster Management Regulations and Directions. However, it may also be possible that the small number of cases is more a result of consumers not exercising their rights; and/or Government implementing agencies such as the NCC not having sufficient capacity to investigate allegations of non-compliance by businesses. The fact that one business that was found to have not complied with the Regulations, and was found to have engaged in prohibitive conduct, and duly fined, sends a strong message to businesses that the violation of consumer rights will not be tolerated, even in complex circumstances such as during the Covid 19 pandemic. Businesses must ensure that their practices comply and uphold consumer rights as intended in the legislation. To do so requires businesses to remain updated with applicable regulations and act swiftly to adjust business practices accordingly. Over-regulation can be burdensome to businesses, and the costs can be passed on to consumers.

6. Conclusion, implications, and recommendations

Consumers are at the heart of every business. The Covid 19 pandemic locked consumers in at home and created a surge in demand for protective goods legislated as necessary when consumers entered public spaces, such as personal protective equipment and sanitizing products. This scramble for goods resulted in business practices that can be harmful to consumers. Consumer agencies, notably the NCC, adapted swiftly and acted to implement regulations that Government had specifically promulgated to protect consumers. A key component was preparing and lodging cases with the NCT. The NCT, in turn, adapted its adjudication practices to hold online hearings, consider cases and issue judgments that tested the Regulations and provide judicial outcomes that will remain as a reference for what constitutes prohibited conduct concerning price gouging. Adequate consumer protection can only happen if all role players, notably Government, businesses and consumers, comply with regulatory requirements. It is only with the cooperation of everyone that further harm can be avoided during a crisis such as the pandemic.

The traditional in-person and face-to-face methods of investigating, adjudicating, and prosecuting excessive pricing complaints would have harmed consumers as the availability, and reasonable pricing of essential goods and services during the COVID-19 pandemic was critical. As seen from the cases analysed, the analysis of excessive pricing complaints is complex and lengthy. Businesses and consumers must work collaboratively to prevent exploitative practices from flourishing and protect consumers, particularly vulnerable and economically precarious consumers, during the Covid 19 pandemic and beyond. The Covid 19 pandemic brought about changes in business practices and consumer behaviour, and some of these

changes will remain beyond the pandemic. One such change is the shift towards online e-commerce. The South African consumer protection legislative environment would further benefit from a re-consideration and re-design of policy to ensure that consumer rights, including consumer information, are protected in this new and changing business environment. The NCC's interventions to limit and prevent price gouging will still need to be evaluated later to determine and quantify the savings to consumers and the economy.

References

- Arora, N., Robinson, K., Charm, T., Grimmelt, A., Ortega, M., Staack, Y., Whitehead, S., & Yamakawa, N. (2020). Consumer sentiment and behavior continue to reflect the uncertainty of the COVID-19 crisis. *McKinsey & Company*. July, 8, 2020.
- Best, L., & Struwig, M. (2020). Online business practices to enable consumer protection in the African context. *International Journal of Economics, Business and Management Research*, 4(10), 118–132.
- Boshoff, W. H. (2020). South African competition policy on excessive pricing and its relation to price gouging during the COVID-19 disaster period. *South African Journal of Economics*, 89(1), 112–140.
- Bryman, A., & Bell, E. (2008). *Business research methods*. Oxford university press, new Delhi.
- Chilisa, B., Kawulich, B., Wagner, C., Kawulich, B. B., & Garner, M. (2012). *Doing social research: A global context. Europe, Middle East & Africa: McGraw-Hill*.
- Cooper, D. R., & Schindler, S. (n.d.). *P.(2008). Business Research Methods*. Boston: Mcgraw. Hill International Edition.
- Creswell, J. W., & Creswell, J. D. (2014). *Research design: Qualitative, quantitative, and mixed methods approach*. Sage publications.
- Easterby-Smith, M., Devi, K. . (2016). Legal Regime for the Consumer Protection and its Human Rights Perspective. *International Journal of Law and Legal Jurisprudence Studies*, 3(3), 316–331.
- Gazette, G. (n.d.). Regulation Gazette No 11057, 657(43116), pp. 1-12. Pretoria: *Government Printers*.
- Hamilton, P.C. & Moreira, T. (2020). Consumers vs Covid-19. UNCTAD publication.
- Kanipakam, S. (2017). Consumer Protection in India - A Special Reference to the Right to Safety. *International Journal of Advanced Research*, 5(6), 719-723.
- Koteshwar, B., (2017). Awareness of Consumer Protection Act- A Study of Consumer Domestic Appliances. *International Journal of Academic Research in Social Sciences & Humanities*, 3(2), 18-22.
- Marshall, C., & Rossman, G. B. (2006). *Designing qualitative research*. Sage publications.
- Patidar, S. (2013). The Consumer Protection Act, 1986 of India- 25 Years of Enactment: A Critical Study. *Pacific Business Review International*, 6(6), 1-5.
- Rajanikanth, M. (2017). A Study on Evolution of Consumer Protection Act in India–CPA1986. *International Journal of Application or Innovation in Engineering & Management*, 6(4), 133.
- Ratshisusu, H., & Mncube, L. (2020). Addressing excessive pricing concerns in time of the COVID-19 pandemic—a view from South Africa. *Journal of Antitrust Enforcement*, 8(2), 256–259.
- Singh, V. P., Bery, A., Biswas, G., & Aggarwal, A. (2014). Awareness about Consumer Protection Act and Medical Negligence among Private and Government Medical College & Hospital Faculty Members. *Journal of Indian Academy of Forensic Medicine*, 36(2), 150–155.
- Thorpe, R. and Jackson, P.R. (2009). *Management Research* (3 Ed). London: Sage.
- UNCTAD. (2021). *United Nations Guidelines on Consumer Protection*.