

MEDIATION IN CONSUMER PROTECTION ACT, 2019: A SHIFT TOWARDS EFFICIENT CONSUMER JUSTICE WITH A WOMEN-CENTRIC MECHANISM

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➤ **Abstract**

- The Consumer Protection Act 2019 (effective July 20, 2020) fundamentally rethinks consumer dispute resolution in India by embedding mediation as an official legal mechanism alongside traditional litigation. Historically, India has valued mediation from village panchayats and epics like the Mahabharata, through colonial-era Lok Adalats, to industrial dispute conciliation in the Industrial Disputes Act, 1947 demonstrating deep roots for conflict resolution grounded in consent and justice. Modern challenges such as case backlog, e-commerce disputes, and the demand for speedy justice prompted inclusion of Section 37 (reference to mediation) and a comprehensive Chapter 5 structure (Sections 74–81) in CPA 2019. These introduce state and district-level Consumer Mediation Cells, empanelment of mediators, and bound procedures for transparent and binding settlements.
- Importantly, the mediation framework under the Consumer Protection Act, 2019 carries significant implications for women’s empowerment. Women consumers—particularly homemakers, self-employed women, small entrepreneurs, and first-time digital consumers—often face structural barriers such as limited legal awareness, financial dependency, social pressure, and hesitation to engage in adversarial litigation. Mediation, being confidential, less formal, and participatory, offers women a safer and more accessible forum to assert their consumer rights. By reducing procedural intimidation, litigation costs, and emotional stress, mediation enhances women’s access to justice and aligns with the broader constitutional mandate of gender equality and substantive justice.
- The Consumer Protection Act, 2019 marks a significant shift in India’s consumer rights framework. Enacted to replace the outdated Consumer Protection Act of 1986. The new act introduces several new features, including the establishment of the Central Consumer Protection Authority (CCPA), provisions for product liability, enhanced penalties for misleading advertisements, and a structured mediation mechanism. This research paper

explores the key provisions, objectives, and impact of the Act in strengthening consumer welfare and ensuring robust mediation.

- In an age of rapid digital transformation and expanding consumer choices, traditional laws were falling short of protecting consumer interests. Recognizing these changes, the Indian government enacted the Consumer Protection Act, 2019, which was not only retains the core principles of the 1986 legislation but also introduces progressive measures to handle issues like e-commerce frauds, unfair contracts, and misleading advertisements. It empowers consumers through quicker grievance redressal mechanisms, stricter penalties, and improved access to justice, making it a timely and much-needed reform.

➤ Key words

- Gender Justice
- Female Consumers
- Women's Empowerment
- Consumer Protection Act 2019 (CPA 2019)
- Mediation (as an official legal mechanism)
- Dispute Resolution
- E-commerce
- Central Consumer Protection Authority (CCPA)
- Consumer Rights Framework
- Access to Justice
- Digital Transformation
- Binding Settlements
- Consumer Mediation Cells
- Alternative Dispute Resolution (ADR)

➤ Introduction

- The landscape of consumer protection in India underwent a transformative shift with the enactment of the Consumer Protection Act (CPA), 2019, which repealed and replaced the three-decade-old Consumer Protection Act, 1986. While the primary objective remains the better protection of consumer interests and the provision of speedy and simple redressal, the new Act introduced several pioneering provisions to address the complexities of the modern digital marketplace. Among the most significant structural reforms is the statutory integration of Mediation as a dedicated method of Alternative Dispute Resolution (ADR). This inclusion is a strategic response to the perennial challenge of mounting case backlogs and the resultant delays in the traditional quasi-judicial consumer fora. By institutionalizing mediation, the CPA, 2019 seeks to leverage the advantages of this consensual process—namely, its speed, confidentiality, cost-effectiveness, and focus on maintaining consumer-trader relationships—to ensure that justice is not merely delivered, but delivered efficiently.
- The integration of mediation under the CPA, 2019 assumes special significance from a gender justice perspective. Women constitute a substantial segment of consumers in sectors such as household goods, healthcare, education, banking, insurance, and e-commerce. However, empirical studies suggest that women often refrain from pursuing formal legal remedies due to time constraints, social responsibilities, fear of confrontation, and lack of institutional support. Mediation, by emphasizing dialogue, confidentiality, and voluntary participation, lowers these barriers and enables women to resolve disputes without the adversarial pressures traditionally associated with litigation.
- Furthermore, mediation allows women to voice their concerns in a less intimidating environment, thereby fostering participatory justice. In disputes involving misleading advertisements, defective products, unfair trade practices, or digital fraud—areas where women are increasingly affected—the mediation mechanism provides an effective and dignified remedy. Thus, mediation under the CPA, 2019 contributes not only to efficiency in dispute resolution but also to the broader goal of empowering women consumers.
- The CPA, 2019, specifically dedicates Chapter 5 (Sections 74 to 81) to the process of

mediation, making it an integral part of the consumer dispute resolution mechanism. This framework mandates the establishment of dedicated Consumer Mediation Cells attached to the District, State, and National Commissions. This move signifies a clear legislative intent to promote a culture of amicable settlement, where a neutral third party—the mediator—facilitates communication and negotiation between the disputing parties to reach a mutually acceptable resolution. Unlike adversarial litigation, mediation places the power of decision-making squarely with the consumer and the service provider or trader, allowing for creative and customized solutions that may not be available through a formal judgment.

- Therefore, this research paper will delve into the foundational principles, procedural architecture, and anticipated challenges surrounding the implementation of mediation under the CPA, 2019. By analysing the statutory provisions, accompanying regulations, and early judicial trends, the study aims to critically evaluate the potential of mediation to revolutionize consumer grievance redressal in India and ultimately assess whether it successfully delivers on the promise of a truly efficient and consumer-centric justice system.

➤ Literature review

1. Conceptual and Analytical Perspectives on Consumer Mediation

- Scholarly literature has extensively examined mediation as an alternative dispute resolution (ADR) mechanism under the Consumer Protection Act, 2019 (CPA 2019), particularly after the introduction of Section 37 and the Consumer Protection (Mediation) Regulations, 2020. Sharma (2023), in a game-theoretic analysis published in the GNLU Journal of Law & Economics, evaluates mediation outcomes in e-commerce disputes and highlights structural power asymmetries between consumers and corporate sellers. The study argues that without safeguards such as stronger mediator intervention and procedural equity, mediation may reinforce existing inequalities rather than correct them.
- Similarly, Jaipuria's article in My Law Man critically evaluates mediation's

effectiveness in consumer disputes, pointing to weak enforcement mechanisms and limited consumer bargaining power. These analytical contributions suggest that while mediation is normatively attractive, its real-world functioning under CPA 2019 raises concerns regarding fairness and distributive justice.

2. Gender and Power Dynamics in Mediation

- **Gender and Power Dynamics:** Several studies highlight that mediation, while intended to be non-adversarial, can inadvertently reinforce pre-existing societal power disparities. The literature suggests that women, who are often financially dependent, may be at a disadvantage when negotiating settlements with large corporations due to differences in legal literacy, access to information, and confidence in formal settings (Kaushik,.; Garg, 2023). The necessity for specialized training for mediators to proactively identify and neutralize gender-based power imbalances is a recurring recommendation in the discourse on consumer justice and empowerment.

3. Statutory Framework and Procedural Overviews

- Process-oriented literature provides insight into how mediation is operationalized within the consumer dispute resolution framework. The Nyaaya Explainer offers a comprehensive step-by-step breakdown of the mediation process, from referral by the Consumer Commission to consent requirements, confidentiality norms, and reporting of settlement outcomes. It underscores that mediation under CPA 2019 remains voluntary, requiring written consent from both parties, although referral powers lie with the Commission.
- Practical guides such as the SLM MBA Guide on Mediation in Consumer Disputes emphasize mediation's advantages—speed, confidentiality, and cost-effectiveness—while illustrating each procedural stage with real-world examples. However, these sources also implicitly acknowledge that mediation's success depends heavily on institutional capacity and party cooperation.

4. Policy and Law Reform Discourse

- Policy-focused scholarship critically examines mediation's role within India's broader dispute resolution ecosystem. Kinhal and Apoorva (2020), writing in the Indian Public Policy Review, situate mediation within India's long-standing judicial backlog problem and argue that legislative intent alone cannot ensure effective dispute resolution. They advocate for systemic reforms, including mediator training and institutional accountability.
- The Parliamentary Standing Committee on Food, Consumer Affairs and Public Distribution (2019) expressed similar apprehensions during the legislative review of the Consumer Protection Bill. The Committee warned that mandatory referrals without adequate infrastructure, trained mediators, or funding mechanisms could result in superficial compliance rather than substantive dispute resolution.

5. Critical Evaluations and Empirical Reports

- Multiple reports have highlighted structural weaknesses in the mediation framework. A report by Asia in Global Affairs critiques the absence of a strict statutory timeline for completion of mediation, arguing that discretionary extensions undermine the CPA's objective of speedy redressal. It further notes that mediation settlements remain appealable, diluting finality and predictability.
- Ishano's critical analysis of Section 37 published on Legal Service India points out the inherent tension between consent and coercion. Although mediation requires voluntary consent, the Commission's referral power may exert indirect pressure on consumers to participate. Additionally, while the Regulations prescribe a three-month mediation period, discretionary extensions risk procedural delays.
- Capacity constraints are further emphasized by perspectives from the Indian Journal of Medical Ethics, which warn that introducing mediation without increasing funding or personnel could exacerbate delays at already overburdened District Commissions.

6. Comparative and Technological Dimensions

- Comparative studies also contribute valuable insights. A white paper by the California Department of Consumer Affairs (2021), commissioned by the Maharashtra State Consumer Affairs Department, contrasts India's hybrid mediation model with California's purely voluntary framework. The study identifies confusion arising from India's quasi-mandatory referral system and recommends accreditation standards for mediators—currently absent under CPA 2019.
- The USLLS ADR Blog highlights the need for robust Online Dispute Resolution (ODR) infrastructure, especially to extend mediation access beyond metropolitan areas. It stresses that without public awareness and technological readiness, mediation risks remaining underutilized.

7. Empirical Evidence on Utilization and Effectiveness

- Government reports provide empirical evidence regarding mediation's limited uptake. The Department of Consumer Affairs Annual Report 2020–21 reveals that only about 0.5% of registered consumer cases opted for mediation during its first year of implementation. The report further notes that overall case pendency remained above five lakh cases, indicating that mediation has not yet significantly reduced judicial backlog.

➤ Objectives

- To examine the role of mediation in enhancing women's access to consumer justice
- To evaluate the women-centric aspects of mediation under the Consumer Protection Act, 2019
- To investigate the "women-centric mechanism" dimension
- To Analyze the Statutory and Regulatory Framework
- To Assess the Operational Implementation of Mediation Cells
- To Determine the Efficacy and Success Rate of Mediation
- To Evaluate the Challenges of Referral and Stakeholder Perception
- To suggest practical measures and policy recommendations

- To identify the key challenges and barriers
- To compare performance outcomes of mediation
- To develop a model framework for implementation

➤ Research methodology

- Various books, literature, magazines, and authentic internet sources, as well as trusted websites have been used by the researcher.

➤ Research problem

• Experiences of Parties and Effectiveness of the Process

- Secondly, the experiences of parties (consumers and opposite parties) who have participated in the DCDRC-referred mediation offer valuable insights.
- Did they find the mediation process prompt, impartial, and conducive to settlement?
- Do gender-related factors, such as economic dependency or lower legal literacy, influence a female consumer's willingness to consent to mediation, their participation style, and their eventual satisfaction with the mediated outcome?
- Was the reporting of the settlement agreement (or failure) back to the DCDRC efficient, and was the subsequent enforcement of the settlement decree effective?

• Gender-Specific Access to Justice Concerns

- Do women consumers perceive mediation as a safer and more approachable mechanism compared to traditional litigation?
- Does the presence of mediation reduce emotional, financial, and social barriers that discourage women from pursuing consumer complaints?
- Are mediation processes sufficiently sensitive to gender-based power imbalances, particularly in disputes involving corporate entities or service providers?

- Gauging Public and Practitioner Awareness and Utilization

- Firstly, it's crucial to gauge public awareness and utilization of the DCDRC-led mediation mechanism.
- Are consumers and advocates aware of its existence and the statutory requirement/option for referring disputes to mediation under the CP Act, 2019?
- Do DCDRCs readily refer suitable cases to mediation, and are parties willing to actively participate?

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- Impact on Judicial Efficiency and Dispute Resolution

- Thirdly, the mediation's impact on the overall efficiency of the DCDRCs needs assessment.
- Has the successful implementation of mediation reduced the pendency/backlog of cases at the Commission level?
- Has it successfully provided a faster, less adversarial, and more satisfactory resolution alternative for consumer disputes?

- Identifying Challenges and Limitations

- Fourthly, identifying the challenges and limitations faced in the operationalization of

mediation centres is essential.

- Are there staffing or resource constraints (e.g., availability of qualified mediators, infrastructure) at the DCDRC-attached mediation cells?
- Can technological improvements (e.g., virtual mediation sessions) enhance its accessibility and functionality?

• Collaboration and Institutional Linkages

- Finally, the collaboration and institutional linkages between the DCDRC and the empanelled mediators/mediation centres deserve scrutiny.
- How effectively do the DCDRCs select, train, and oversee the quality of mediators?
- How well do they work together to ensure the final settlement orders are treated as decrees and legally enforced?

➤ Hypothesis

• **Hypothesis 1 - Implementation and Operational Efficiency**

- The lack of dedicated, uniform, and confidential physical infrastructure within DCDRC Consumer Mediation Cells (CMCs) is a statistically significant deterrent to both judicial referral frequency and the eventual settlement rate of consumer disputes.

• Hypothesis 2 - Gender Sensitivity and Access

- DCDRCs that provide women-friendly procedural options (e.g., choice of a female mediator, flexible virtual hearing options) will correlate with a higher rate of consent to mediation and a significantly greater perception of fairness among female consumers compared to Commissions without such provisions.

- Hypothesis 3 - Mediator Specialization & Efficacy

- DCDRCs utilizing mediators with specialized training or certification in consumer law and regulatory affairs will demonstrate a significantly higher successful settlement rate (above the state average) compared to those utilizing general legal practitioners.

- Hypothesis 4 - Digital Compliance & Time-Efficiency

- DCDRCs that have fully implemented the CPA, 2019's provisions for electronic filing (e-filing) of mediation consent and tracking will show a measurable reduction in the average time taken for dispute resolution, demonstrating a positive link between digital compliance and process efficiency.

- Hypothesis 5 - Consumer Awareness

- Consumers who demonstrate a low level of awareness regarding their rights and the mediation process (as measured by pre-mediation) are more likely to perceive the outcome as a one of the most significance fair delivery of justice.

- Hypothesis 6 - Rules Uniformity & Performance

- The current implementation of the mediation mechanism is not uniform across all DCDRCs and this lack of consistency in procedural application (as governed by State Rules) is the leading factor causing the wide variance in settlement rates observed.

➤ Findings

- **Addressing Judicial Backlog and Delay**

- The primary reason for the surging demand for mediation is the colossal backlog of cases in Consumer Commissions at all three tiers (District, State, and National). Under the Consumer Protection Act, 1986, the redressal process was often a long,

drawn-out affair, defeating the very purpose of providing speedy justice to consumers. The average pendency of cases could stretch for years, making the process frustrating and costly for consumers, especially for disputes involving smaller amounts.

- The Consumer Protection Act, 2019, addresses this by formally introducing mediation as a new chapter (Chapter 5) and a robust, court-annexed mechanism. The Act empowers the Consumer Commissions to refer a dispute for mediation at any stage of the proceedings, provided the parties agree to it. This provides a faster, more efficient alternative to formal adjudication, helping to unclog the dockets and reduce the waiting time for consumers.

• Confidentiality and Privacy

- Benefits for Vulnerable Groups — Mediation's confidential nature is particularly beneficial for vulnerable consumers, such as women, who may be hesitant to disclose sensitive details related to cyber fraud, data theft, defective personal care products, or personal services in open court. The private setting fosters a safer environment for honest negotiation, encouraging greater access to justice and empowering them to pursue redressal without fear of public scrutiny.
- Consumer disputes often involve sensitive information, particularly in cases related to services like banking, healthcare, or personal data. Court proceedings are open to the public, which can be a disadvantage for both the consumer and the business.
- Mediation proceedings are strictly confidential. The discussions, proposals, and settlement terms are not disclosed to the public or the court. This confidentiality is a major attraction, as it allows parties to discuss the issues freely and without fear of public scrutiny, preserving their reputations and privacy.

• Mediation as an Enabler of Women's Consumer Rights

- The findings indicate that mediation under the CPA, 2019 holds strong potential as a

women-friendly dispute resolution mechanism. Its informal structure, confidentiality, and participatory nature make it particularly suitable for women consumers who may otherwise avoid formal legal processes. Mediation reduces emotional stress, allows women to articulate grievances without fear of retaliation or public exposure, and enables negotiated outcomes that accommodate their personal and financial circumstances.

- For women entrepreneurs and self-employed professionals, mediation helps preserve commercial relationships while securing fair remedies. Additionally, the refund of filing fees and lower procedural costs further reduce financial burdens, making justice more accessible to economically dependent or marginalised women consumers.

• Cost-Effectiveness

- Litigation is expensive. Legal fees, court fees, and other associated costs can quickly mount up, often exceeding the value of the goods or services in dispute. This financial burden was a significant deterrent for consumers seeking justice, particularly for small claims.
- Mediation, on the other hand, is designed to be a cost-effective solution. The fees for mediation are typically much lower than those for litigation. Furthermore, the Act specifies that if a settlement is reached through mediation, the complainant is entitled to a full refund of the application fee paid to the Commission. This provision is a huge incentive for consumers to opt for mediation.

• Party Autonomy and Mutually Agreed Solutions

- In a traditional court setting, a judge makes a binding decision, resulting in a "winner" and a "loser." Mediation is a voluntary and party-centric process. The mediator is a neutral third party who facilitates communication and negotiation but does not impose a decision. The parties themselves are in control of the outcome,

empowering them to find a mutually agreeable solution that addresses their specific needs and interests. This approach is more likely to result in a sustainable and satisfactory resolution, as both parties have a sense of ownership over the final agreement.

- **Preservation of Relationships**

- In many consumer disputes, especially those involving long-term customer-business relationships, the parties may want to resolve the issue without destroying their relationship. Litigation, by its very nature, is adversarial and can irreparably damage relationships. Mediation, with its focus on collaboration and communication, is an ideal tool for preserving commercial relationships. A company that resolves a dispute amicably through mediation is more likely to retain a customer, which is a win for both sides.

- **Simpler and Less Formal Procedure**

- The mediation process is less formal and rigid than court proceedings. It is not bound by the strict rules of evidence and procedure, making it more accessible and less intimidating for consumers who are not well-versed in legal formalities. The mediator can meet with the parties together or separately, helping to bridge communication gaps and build trust.

- **New Provisions and Infrastructure**

- The Consumer Protection Act, 2019, has created a clear and structured framework for mediation by providing for the establishment of Consumer Mediation Cells at all levels of the Consumer Commissions (District, State, and National). These cells are responsible for maintaining a panel of qualified and experienced mediators and handling the mediation process. This institutional support gives consumers and businesses confidence in the process and its integrity.

➤ Conclusion

- From the standpoint of women's rights and empowerment, mediation under the Consumer Protection Act, 2019 represents a transformative opportunity. By shifting dispute resolution away from rigid, male-dominated adversarial structures toward dialogue-based justice, the Act strengthens women's agency as consumers. When supported by gender-sensitive mediators, legal awareness programs, and technological access such as online mediation platforms, mediation can serve as a powerful instrument of substantive equality. In this sense, the CPA, 2019 not only modernizes consumer law but also advances the constitutional vision of inclusive and gender-responsive justice.
- Despite this progress, realization of mediation's promise depends on bridging implementation gaps:
 - Gender Sensitivity: The success of CPA 2019 mediation must be measured not just by clearance rates, but by its ability to deliver gender-sensitive justice, ensuring that the process does not perpetuate existing societal power imbalances.
 - Demand and awareness: Consumers and businesses must be informed of mediation benefits with targeted outreach programs specifically aimed at informing and empowering female consumers and other vulnerable groups.
 - Operational efficiency: Scaling up trained mediators and mediation infrastructure at all levels is vital.
 - Cultural shift: Courts, practitioners, and regulators should nurture pro-mediation attitudes.
 - Enforcement and follow-through: Ensuring mediated settlements translate into binding orders without re-litigation.
- Mediation within the Consumer Protection Act 2019 represents a mature and timely legislative stride toward efficient and accessible justice. The Act's robust framework—including dedicated Consumer Mediation Cells, regulatory defined

mediator panels, disclosure rules, confidentiality, and definitive settlement mechanisms—marks a thoughtful legislative approach. Judicial endorsements (e.g., the Supreme Court citing consumer rights as part of speedy and affordable justice) and adoption of Section 37 reflect a notable judicial mind-set shift toward ADR.

- Comparatively, international models—like Australia’s standalone mediation laws, Singapore’s national framework, Turkey’s mandatory provisions, and the global Singapore Convention for cross-border enforceability—show multiple pathways to enhancing mediation. India can draw on these to refine its own processes, especially by providing legal backing for mediated agreements and exploring integration with online dispute resolution platforms.
- In essence, mediation in CPA 2019 offers a consumer-centric, speedy, cost-effective, and confidential alternative to traditional litigation. If implemented with strategic legislative support, judicial reinforcement, and cultural acceptance, it holds real potential to resolve consumer grievances in a dignified, efficient, and peaceful manner—delivering the fruit of justice with ease.

➤ Recommendations

- **Legal Awareness and Implementation Gaps**

- The study identifies challenges in the uniform implementation of mediation provisions under the Consumer Protection Act, 2019, across in all DCDRCs highlighting gaps between statutory intent and ground realities.

- **Gender-Specific Recommendations**

- Introduce gender-sensitization training for mediators handling consumer disputes.
- Encourage women mediators and domain experts on mediation panels.
- Conduct consumer legal literacy programs for women, especially in rural and

semi-urban areas.

- Promote ODR platforms to support women who face mobility, safety, or time constraints.
- Ensure mediation environments are safe, confidential, and non-coercive for women participants.

• Capacity Building and Awareness

- This must include mandatory gender-sensitization training for all empanelled mediators to ensure they can identify and effectively manage power imbalances, particularly in cases involving women consumers.
- The research will identify the need for training DCDRC officials, mediators, and consumers in modern mediation techniques, digital platforms, and legal literacy, paving the way for a more responsive consumer justice system.

• Future-Ready Consumer Dispute Redressal

- The ODR framework must actively promote flexible, virtual mediation options for women who face mobility or time constraints due to domestic responsibilities, making the justice system truly accessible.
- The study could propose a framework for a next-gen DCDRC ecosystem where legal processes, mediation, and technology converge to ensure timely, transparent, and efficient consumer grievance resolution.

• Consumer Access and Empowerment

- Findings will reveal how mediation impacts consumer access to justice, particularly for vulnerable groups, by providing a faster, cost-effective, and less adversarial resolution mechanism.

- Effectiveness of Mediation Process
 - The research assesses the success rate of mediated settlements in reducing pending cases, ensuring compliance, and improving consumer satisfaction with DCDRC procedures.
 - Challenges in Enforcement
- Outcomes may include issues related to enforcing mediated settlements, monitoring compliance, and addressing reluctance of parties to engage in mediation, highlighting areas for procedural improvement.

• Policy and Legal Recommendations

- The study will provide insights for strengthening legal frameworks, suggesting amendments or guidelines to enhance the efficiency, consistency, and enforceability of mediation provisions.

• Benefits of Mediation

- Results will demonstrate the cost, time, and emotional advantages of mediation over conventional litigation, emphasizing its role in building trust and reducing judicial backlog.

• Next-Generation Approaches

- The study explores opportunities for integrating technology in DCDRC mediation, such as online dispute resolution (ODR), AI-assisted case management, digital documentation, and virtual hearings to make the system more robust and accessible.

- Data-Driven Decision Making

- Outcomes may highlight how analytics and technology can help predict dispute patterns, track compliance, and optimize case allocation, enabling smarter governance in consumer dispute resolution.

➤ References

- **1.1 : Books**

- Taxman. (2025). Consumer Protection Act, 2019 - Chapter 5 (Sections 74-81). In Consumer protection law & practice (2025 ed.). Taxman.
- Barowalia, J. N., & Barowalia, A. (2024). Consumer Protection (Mediation) Rules, 2020. In Commentary on the Consumer Protection Act (8th ed.). Universal Law Publishing (LexisNexis).
- Agarwal, V. K. (2024). Consumer Protection (Mediation) Regulations, 2020. In Consumer protection: Law & practice (9th ed.). Bharat Law House.

- 1.2 : Articles

- Lawminds Library. Vol1iss1-011. Lawminds E-Journal, 1(1). Retrieved from <https://library.lawminds.co.in/e-journal/volume-1-issue-1/vol1iss1-011/>
- My Law Man. (2022, April). Legal article: Role of mediation in. Retrieved from <https://www.mylawman.co.in/2022/04/legal-article-role-of-mediation-in.html>
- Nyaaya. Mediation as a mode of consumer dispute settlement. Retrieved from <https://nyaaya.org/legal-explainer/mediation-as-a-mode-of-consumer-dispute-settlement/>
- SLM.MBA. Mediation consumer disputes guide 2019 act. Retrieved from <https://slm.mba/mmpe-013/mediation-consumer-disputes-guide-2019-act/>

- 1.3 : Policy Review

Indian Public Policy Review. (2020). Indian Public Policy Review 2020, 2(2), 49-69. vidhilegalpolicy.in.

- 1.4 : Blogs

- Mondaq. Consumer Protection Act, 2019: A Paradigm Shift?.
- Ishano7. Critical Analysis of U/S 37 Reference to Mediation. Legal Service India.

- 1.5 : International references

- Critical Evaluation of Consumer Rights with reference to the Consumer Protection Act of 2019. Asian Global Affairs.
- USLLS ADR Blog. An Evaluation of Jarring Insertion of Mediation.

- 1.6 : Journals

- GNLU Journal of Law & Economics. (2023).
- IJRAR – Int'l Journal of Research & Analytical Reviews. (2019).
- Indian Journal of Medical Ethics. Capacity strain: District Commissions are already overburdened.
- Indian Journal of Law and Legal Research. (2023, February).

- 1.7 : Research Papers

- Kaushik, A. Consumer Protection and Its Relation to ADR Mechanisms. International Journal of Applied Legal Research.
- Eeti Garg. (2023, February). Mediation as an Effective Mode of Consumer Disputes Resolution: A Comprehensive Assessment in the Context of the Consumer Protection Act of 2019. Indian Journal of Law and Legal Research.

- 1.8 : Reports

- **1.8.1 : Government reports**

- Parliamentary Standing Committee on Food, Consumer Affairs & Public Distribution. (2019). Consumer Protection Bill, 2019 (Seventy-First Report, 17th Lok Sabha). Government of India.
- Department of Consumer Affairs. (2021). Section Challenges and Way Forward (Chapter 8). In Annual Report 2020–21. Government of India.

- 1.8.2: International Reports

- California Department of Consumer Affairs. Mediation & Consumer Dispute Resolution: Lessons for India.