

INTERNATIONAL JOURNAL FOR LEGAL RESEARCH AND ANALYSIS



Open Access, Refereed Journal Multi-Disciplinary
Peer Reviewed

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CONSUMER PROTECTION IN ANCIENT INDIA: A CRITICAL STUDY OF MANUSMRITI IN THE MODERN LEGAL CONTEXT

AUTHORED BY - MS. BIJAYA DAS

Designation: Assistant Professor

Institution: Apex Professional University

Pasighat, Arunachal Pradesh

ABSTRACT

Consumer protection is often viewed as a modern legal development; however, its conceptual roots in India can be traced to ancient legal texts such as the *Manusmriti* and other Dharmashastra literature. This paper critically examines the idea of consumer protection in ancient India with special reference to the *Manusmriti*, and analyses its relevance in the contemporary Indian legal framework. The study explores how early norms relating to fair trade, honest weights and measures, prohibition of adulteration, and penalties for fraudulent practices reflected an ethical concern for buyer welfare. It also highlights the significant role assigned to the king (state) in regulating markets, supervising traders, and protecting consumers from exploitation, indicating a proto-welfare orientation in ancient economic regulation.

Using a descriptive methodology based on secondary sources, the paper traces the evolution of consumer-protection principles from dharma-based moral obligations in ancient texts to statutory, rights-based protections under modern Indian laws, particularly the Consumer Protection Acts of 1986 and 2019. A comparative analysis reveals both continuity and change: while modern law institutionalizes consumer rights, dispute-resolution mechanisms, and digital-era safeguards, its foundational values of fairness, honesty, and state responsibility resonate with ancient principles.

At the same time, the paper critically evaluates *Manusmriti* in light of constitutional values of equality, justice, and non-discrimination. It argues that although the text contains valuable ethical insights for regulating trade, its caste- and gender-based hierarchies are incompatible with the Indian Constitution. Therefore, only its anti-fraud and welfare-oriented elements can be selectively adapted within a constitutional framework.

The study further assesses the relevance of Manusmriti's ethical approach to addressing contemporary challenges such as digital fraud, misleading advertising, and e-commerce disputes. It concludes that while *Manusmriti* does not provide a comprehensive consumer-protection regime by modern standards, it offers important normative foundations that continue to inform India's consumer-protection discourse when critically and constitutionally reinterpreted.

Key words: *Consumer protection, Manusmriti, Contemporary Relevance, Ethical Principles, Digital Fraud*

INTRODUCTION

Manusmriti, an ancient Indian Dharmashastra text, contains provisions addressing fraudulent trade practices, emphasizing ethical commerce and penalties for deceit, which align with early consumer protection concepts. These rules prohibited selling adulterated goods as pure, defective items as good, or short weights, while mandating king-enforced price regulations. In modern legal contexts, such principles echo in India's Consumer Protection Act, 2019, though adapted to contemporary frameworks like product liability and e-commerce disputes.¹

The Manusmriti, an ancient Indian legal text, contains early norms related to consumer protection within its broader framework of Dharma and commerce. While it predominantly addresses moral and social duties, the Manusmriti prescribes ethical conduct for merchants and the safeguarding of buyers' interests, reflecting an ancient concern for fair trade and consumer welfare. For instance, it advocates penalties for fraudulent trade practices and emphasizes honest weights and measures, which are crucial consumer protection principles².

OBJECTIVE OF THE STUDY

1. To study the idea of consumer protection in ancient India, with special reference to Manusmriti and other Dharmashastra texts.
2. To examine the role of the State in Manusmriti in regulating trade and protecting buyers from fraud and unfair practices.

¹ <https://ijarsct.co.in/Paper17905.pdf>.

² Klimov, V. V. (2023). The Consumer Protection System Formation: Historical and Legal Perspective. *Actual Problems of Russian Law*, 18(12), 24–32. <https://doi.org/10.17803/1994-1471.2023.157.12.024-032>.

3. To trace the evolution of consumer-protection principles from ancient texts to modern Indian consumer laws.
4. To critically analyze Manusmriti's consumer-protection principles in light of constitutional values of equality and justice.
5. To assess the relevance of Manusmriti's ethical approach to trade in addressing contemporary consumer issues, including digital fraud.

RESEARCH METHODOLOGY

The present study is descriptive in nature and data was collected from previous articles, journals, and various websites through secondary sources.

REVIEW OF LITERATURE

Petlenko, I. (2025) says that the Manusmriti has a dual role in modern India, serving as a source of historical legal tradition and also criticizing gender and caste discrimination.

Chawla, N. et al. (2021) explores that New regulations and a secure system are essential for e-commerce success in India, with cash on delivery being a priority and customer trust being built through website information and effective customer care services.

Kumar, N. (2025) while examining the Consumer protection effectiveness in digital environments observes that the Consumer Protection Act 2019 and IT Act 2000 provide updated legal frameworks to protect consumers from digital threats.

Goyal, P. et al. (2013) finds that Ancient Indian law codes regulated consumer protection by establishing human values and code of trade practices, ensuring quality goods and services at fair prices.

Kerti, R. (2025) explores that Traditional consumer protection laws often fail to adapt to the complexities of digital commerce, highlighting the need for adaptive, integrated, and globally coordinated legal responses.

Khan, T. et al. (2023) observes that Consumer laws in Pakistan and India show similarities and differences, but both countries face challenges in implementing and enforcing their laws effectively.

Pathak, S. (2024) finds that the study explores the need for robust e-consumer protection frameworks in India's digital economy, analyzing key legislation and e-commerce dynamics, and proposes policy recommendations to address challenges and promote ethical practices.

R, M., & Pandey, A. (2025) finds that the Indian Constitution, influenced by B.R. Ambedkar,

has significantly improved the legal and social status of Shudras and women, but cultural attitudes and practices still perpetuate discrimination.

Kumari, K. (2023) says that Consumer protection laws in India need a strong and coordinated consumer movement to effectively protect consumers' interests and address market practices like "Caveat emptor" (let the buyer beware).

Chakraborty, S. (2024) finds that Manusmriti, written by Manu, has influenced modern Indian governance and legislation, with its ideas of federalism, decentralization, rational tax administration, and realistic foreign policy also influencing other countries.

According to *Tiwari, V. et al. (2025)*; Legal education is crucial for enhancing consumer protection in India's online shopping platforms by preparing future practitioners to address modern consumer law issues.

A. (2025) says that Indian legal systems have successfully balanced economic liberalization with legal safeguards to promote inclusive growth and ensure social justice and economic fairness.

Mehta, P. (2018) finds that Ancient India had a mixed economy with the state playing a dual role as regulator and competitor, relying less on market forces for social goods.

Barapatre, N. et al. (2016) observes that Consumer rights were established in ancient times, with medical professions and rulers providing patients with rights, and the current protection of these rights is a replication of this ancient practice.

DISCUSSION ON THE TOPIC

Consumer Protection in Ancient India and Manusmriti: Links to Modern Law:

Ancient Indian texts, especially **Manusmriti**, show that protecting buyers from unfair trade and fraud was an explicit concern of early law-makers. Contemporary scholarship uses this tradition to illuminate today's Indian consumer protection regime and its tensions with hierarchy, caste, and gender.

Consumer Protection in Ancient Dharmashastra

Manusmriti verse 8.165 directs kings to nullify fraudulent transactions, including deceitful mortgages, sales, gifts, and any deal involving fraud (upadhi). For instance, selling an item with hidden defects or misrepresenting its utility rendered the sale invalid, with punishments for both parties. Ethical conduct extended to prohibiting merchants from deceiving buyers on

quality or quantity, with fines for price manipulation.³

Manusmriti and related texts laid down rules on **trade, pricing, property, taxation, and guild regulation**, with clear concern for preventing fraud and exploitation in markets, including regulation of trade and agriculture, tax systems, and wealth distribution⁴. Broader surveys of ancient literature identify Manu Smriti, Narada Smriti, Brihaspati Smriti and Arthashastra as sources of explicit **codes of trade practices** to protect buyers’ interests⁵. Ancient Indian regulation is described as a proto “welfare state,” with the state as both regulator and market actor, using price control, anti-cartel rules, and direct intervention for **consumer protection**⁶.

Theme	Ancient basis	Modern parallel
Fair trade & anti-fraud	Rules on trade, guilds, price control (Petlenko, 2025; Goyal et al., 2013; Mehta, 2018)	Unfair trade practice provisions (Chawla & Kumar, 2021; Kumari, 2023; Pathak, 2024; Khan et al., 2023)
State duty toward subjects/consumers	Dharma-based welfare role (Petlenko, 2025; Mehta, 2018)	Constitutional social-welfare mandate (R & Pandey, 2025; Kumari, 2023; Anita, 2025)
Sectoral regulation (food, medicine, services)	Codes for merchants, professionals (Goyal et al., 2013; Barapatre & Joglekar, 2016)	Product liability, medical consumer rights (Chawla & Kumar, 2021; Kumari, 2023; Barapatre & Joglekar, 2016)

Figure 1: Linking ancient trade rules to modern consumer law.

Consumer-protection principles from ancient texts to modern Indian consumer laws:

Consumer protection principles evolved from dharma-based ethics in ancient texts like Manusmriti to codified rights in modern Indian laws, transitioning from moral oversight to

³ <https://www.wisdomlib.org/hinduism/book/manusmriti-with-the-commentary-of-medhatithi/d/doc201086.html>.

⁴ Petlenko, I. (2025). THE MANUSMRITI AS A SOURCE OF POLITICAL PHILOSOPHY AND LEGAL CULTURE IN INDIA. *Bulletin of Taras Shevchenko National University of Kyiv. Philosophy*. <https://doi.org/10.17721/2523-4064.2025/12-16/23>

⁵ Goyal, P., Goyal, M., & Goyal, S. (2013). Consumer Protection Law in Ancient India. *Journal of Human Values*, 19, 147 - 157. <https://doi.org/10.1177/0971685813492268>

⁶ Mehta, P. (2018). Economic Regulations, Competition, and Consumer Protection in Ancient India. *The Antitrust Bulletin*, 63, 316 - 329. <https://doi.org/10.1177/0003603x18780557>

statutory enforcement. Manusmriti and Arthashastra prohibited trade fraud and mandated fair measures under royal supervision, laying ethical foundations later formalized in the Consumer Protection Act, 1986, and strengthened in 2019. This progression reflects adaptation to industrialization, globalization, and digital commerce while retaining core fairness ideals⁷.

Ancient Foundations: Manusmriti emphasized truthful commerce, banning deceitful sales and false weights, with the king appointing market inspectors for buyer safeguards. Arthashastra detailed state controls on prices, quality, and penalties, viewing consumer welfare as essential to prosperity. These texts treated buyers as vulnerable, prioritizing restitution over punishment⁸.

Colonial Transition: British rule introduced contract laws like the Indian Contract Act, 1872, shifting focus to individual remedies but neglecting collective protections. Early 20th-century movements highlighted adulteration, influencing post-independence reforms amid economic liberalization⁹.

Modern Codification

The 1986 Act established six consumer rights (safety, information, choice, representation, redress, education), creating forums for speedy justice. The 2019 Act expanded to e-commerce, product liability, and a Central Authority, addressing digital fraud and unfair practices¹⁰.

Era	Key Features	Enforcement Mechanism¹¹
Ancient (Manusmriti)	Dharma, anti-fraud, state oversight	Kingly inspectors, penalties
Colonial	Contractual remedies	Civil courts, limited scope
Post-1986	Explicit rights, forums	Consumer commissions
2019 Act	Digital inclusion, liability	CCPA (Central Consumer Protection Authority), e-filing, class actions

Figure 2: Evolutionary Comparison

⁷ <https://siasatjournal.com/index.php/siasat/article/download/126/112>.

⁸ <http://journals.sagepub.com/doi/10.1177/0003603X18780557>.

⁹ <https://pmc.ncbi.nlm.nih.gov/articles/PMC5822974/>.

¹⁰ <https://www.tandfonline.com/doi/full/10.1080/24730580.2025.2497006>.

¹¹ Ibid

From Manusmriti to the Modern Legal Framework

Modern Indian consumer law (Consumer Protection Acts 1986 and 2019, e-commerce rules, IT Act 2000) is framed as a shift from **caveat emptor** to state-backed consumer rights, but scholars trace its **intellectual ancestry** to ancient protections in Arthashastra and Smriti literature^{12 13 14}. Historical work shows ancient consumer protection as part of a wider socio-economic philosophy; modern law generalizes this to all citizens and markets, including digital commerce and online contracts^{15 16 17}

At the same time, critical studies stress Manusmriti's role in legitimizing **caste and gender discrimination**, contrasting its hierarchical social order with the Constitution's egalitarian consumer-citizen model¹⁸. Ambedkarite and feminist readings use this contrast to argue that only *select* Manusmriti principles (state duty, honesty in trade, welfare orientation) are normatively acceptable today, while its status and gender norms are incompatible with modern rights¹⁹.

Contemporary Relevance and Critical Perspective:

In the modern legal context, consumer protection has evolved into a complex and specialized body of law that deals systematically with consumer rights against unfair trade practices, product safety, and fair contractual terms. Contemporary consumer law frameworks, such as those in India and beyond, emphasize the need for institutional mechanisms and statutory regulations to enforce consumer rights effectively, adapting to challenges like digital economy vulnerabilities and technological manipulations^{20 21}

¹² Chawla, N., & Kumar, B. (2021). E-Commerce and Consumer Protection in India: The Emerging Trend. *Journal of Business Ethics*, 180, 581 - 604. <https://doi.org/10.1007/s10551-021-04884-3>

¹³ Barapatre, N., & Joglekar, V. (2016). The rights of patients as consumers: An ancient view. *Ayu*, 37, 152 - 157. https://doi.org/10.4103/ayu.ayu_216_15

¹⁴ Khan, T., Zakir, M., & Iqbal, M. (2023). Comparative Analysis of Consumer Laws in Pakistan and India. *Spring 2023*. <https://doi.org/10.54183/jssr.v3i2.363>

¹⁵ A. (2025). Balancing Economic liberalization with legal Safeguards: the Indian experience. *Economic Sciences*. <https://doi.org/10.69889/k8m0w691>

¹⁶ Tiwari, V., & Chakraborty, V. (2025). Access to Legal Education to Protect India's Online Contracts and Customer Interests. *Asian Journal of Legal Education*, 12, 185 - 197. <https://doi.org/10.1177/23220058251343458>

¹⁷ Kerti, R. (2025). CONSUMER PROTECTION IN THE DIGITAL ECONOMY: A LEGAL ANALYSIS OF E-COMMERCE PRACTICES AND REGULATORY CHALLENGES. *Lex localis - Journal of Local Self-Government*. <https://doi.org/10.52152/801041>

¹⁸ R, M., & Pandey, A. (2025). Dismantling Discrimination: The Journey from Manusmriti to Modern Legal Reforms for Marginalized Groups. *Journal of Neonatal Surgery*. <https://doi.org/10.63682/jns.v14i2s.8503>

¹⁹ Petlenko, I. (2025). PHILOSOPHICAL SPECIFICS OF THE ECONOMIC CULTURE OF MANUSMRITI. *ФІЛОСОФІЯ ЕКОНОМІКИ ЯК СТРАТЕГІЧНИЙ НАПРЯМ СОЦІАЛЬНОГО ДИСКУРСУ*. <https://doi.org/10.36059/978-966-397-518-4-13>

²⁰ Parsheera, S., & Moharir, S. (2020). Personal Data and Consumer Welfare in the Digital Economy. *SSRN Electronic Journal*. <https://doi.org/10.2139/ssrn.3545497>.

²¹ Hudyma-Pidverbetska, M. M. (2025). Consumer rights protection in the digital environment: challenges and

Comparing the Manusmriti's provisions with modern consumer protection laws reveals significant differences in scope and enforcement mechanisms. The Manusmriti primarily reflects moral and customary guidelines without formal institutional enforcement, while modern laws establish dedicated agencies, specialized courts, and detailed statutory rights. Modern frameworks also address complexities unheard of in ancient times, such as digital consumer welfare, personal data protection, and sector-specific regulations²².

Nonetheless, Manusmriti's emphasis on honest dealings and the ethical duty of merchants resonates with foundational consumer protection values that persist today. Its approach underscores the enduring importance of ethics in commerce, which modern laws complement with rigorous legal codifications, institutional enforcement, and broad-based consumer empowerment. Thus, a critical study reveals that while the Manusmriti does not provide a comprehensive consumer protection regime by modern standards, it laid important normative foundations emphasizing fairness and responsibility that remain relevant in contemporary consumer law discourse²³.

Manusmriti continues to shape political rhetoric—e.g., the ruler as “servant of Dharma” even as formal law disavows its discriminatory rules²⁴. Comparative and historical work shows that while **substantive consumer rights** (safety, fair price, redress) look modern, their **conceptual roots** in India reach back to Smriti and Arthashastra traditions of protecting subjects from abuse by traders, professionals, and even the state itself²⁵. Contemporary Indian consumer laws draw indirect inspiration from Manusmriti's anti-fraud stance, as seen in prohibitions against unfair trade practices under the Consumer Protection Act. Recent judicial references, like a 2025 Supreme Court ruling citing Manusmriti on familial duties, show its lingering influence in jurisprudence, though not directly on consumer cases. Unlike ancient texts' reliance on royal intervention, modern redress occurs via consumer forums emphasizing evidence-based

perspectives. Uzhhorod National University Herald. Series: Law, 2(86), 87–94. <https://doi.org/10.24144/2307-3322.2024.86.2.14>.

²² Hudyma-Pidverbetska, M. M. (2025). Consumer rights protection in the digital environment: challenges and perspectives. Uzhhorod National University Herald. Series: Law, 2(86), 87–94. <https://doi.org/10.24144/2307-3322.2024.86.2.14>.

²³ Goswami, P. (2025). Legal Innovation in Hindu Law: The Intersection of Tradition, Modernity, And Gender Justice in Contemporary India. European Economic Letters (EEL), 15(3), 1162–1183. <https://doi.org/10.52783/eel.v15i3.3509>.

²⁴ Chakraborty, S. (2024). Concept of Federalism and Decentralization of Administrative Powers: Reflection of ‘Manusmriti’ in Modern Governance of the Republic of India. *International Journal For Multidisciplinary Research*. <https://doi.org/10.36948/ijfmr.2024.v06i03.23357>

²⁵ Goyal, P., Goyal, M., & Goyal, S. (2013). Consumer Protection Law in Ancient India. *Journal of Human Values*, 19, 147 - 157. <https://doi.org/10.1177/0971685813492268>

remedies²⁶.

Manusmriti's framework prioritized moral dharma over codified rights, limiting accessibility due to caste-based trade restrictions and lack of formal consumer forums. While progressive for its era in curbing adulteration, it falls short of modern standards like implied warranties or class actions, reflecting a paternalistic rather than rights-based approach. Its relevance today lies in reinforcing ethical baselines amid rising digital frauds²⁷.

Role of the State in Manusmriti in regulating trade and protecting buyers from fraud and unfair practices:

Manusmriti assigns the king (state) a central role in regulating trade through active oversight of markets, ensuring fair weights, measures, and honest dealings to protect buyers from fraud. The ruler appoints inspectors (gopta or market supervisors) to monitor merchants, punish deceit like false scales or adulterated goods, and enforce dharma-based ethical commerce. This paternalistic intervention maintained economic order, with penalties ranging from fines to corporal punishment for violations²⁸.

Royal Duties

The text mandates the king to daily inspect markets, verify commodity purity, and set just prices, preventing exploitation by sellers. Violations of trade ethics, such as selling inferior goods as superior, invited state reprisal to uphold societal welfare. Guilds assisted but ultimate authority rested with the sovereign²⁹.

Protection Mechanisms

- State agents tested weights and measures against royal standards, confiscating fraudulent tools.
- Fraudsters faced graduated penalties, prioritizing restitution to buyers over mere punishment.
- Broader edicts prohibited monopolies and hoarding, stabilizing supply for consumers.

²⁶ <https://www.opindia.com/2025/12/echoes-of-manu-how-ancient-law-shapes-modern-indian-jurisprudence>.

²⁷ https://cuts-ccier.org/pdf/Article-Economic_Regulations_Competition_and_Consumer_Protection_in_Ancient_India-AntitrustBulletin.pdf.

²⁸ <http://journals.sagepub.com/doi/10.1177/0003603X18780557>.

²⁹ Ibid

Modern Parallels

Manusmriti's state-led regulation prefigures contemporary agencies like India's Consumer Protection Authority, which monitor unfair practices and enforce standards. While ancient oversight relied on personal royal vigilance, modern systems use statutory powers, e-commerce surveillance, and penalties, evolving the king's dharma into codified consumer safeguards³⁰.

Manusmriti's consumer-protection principles in light of constitutional values of equality and justice:

Manusmriti's consumer-protection principles promote fairness in trade through dharma, prohibiting fraud and ensuring honest weights, but they operate within a varna-based hierarchy that conflicts with constitutional equality under Articles 14 and 15. While the text's emphasis on justice via state oversight aligns with Article 39A's directive for equal justice, its caste-linked restrictions on occupations undermine universal access to remedies. Modern interpretations selectively adopt its ethical core, subordinating hierarchical elements to constitutional supremacy for equitable consumer safeguards³¹.

Equality Conflicts

Manusmriti ties trade roles to varna (e.g., Vaishyas for commerce), excluding lower castes from full market participation or protections, clashing with Article 14's equality before law. Buyer-seller duties assume social stratification, where penalties vary by status, contrasting constitutional non-discrimination. This varna bias perpetuates inequality, as critiqued by reformers like Ambedkar, rendering ancient principles partially incompatible without reform³².

Justice Alignment

The text's royal regulation for fair dealings advances substantive justice, mirroring Preamble goals of social justice by protecting vulnerable buyers from exploitation. State intervention against deceit fosters economic equity, akin to Article 21's right to livelihood without unfair practices. However, justice in Manusmriti prioritizes dharma over individual rights, lacking procedural fairness guaranteed by constitutional due process³³.

³⁰ <https://www.ssrn.com/abstract=3630775>.

³¹ <https://journals.library.brandeis.edu/index.php/caste/article/download/502/254>.

³² Ibid

³³ <http://pasca.unhas.ac.id/ojs/index.php/halrev/article/download/302/175>.

Aspect	Manusmriti Principle	Constitutional Value ³⁴	Modern Adaptation
Trade Access	Varna-restricted	Art. 14/15 equality	Universal via Consumer Protection Act
Fraud Remedies	Status-based penalties	Art. 39A equal justice	Class actions, forums for all
State Role	Kingly dharma enforcement	Art. 21 dignified life	CCPA oversight, non-discriminatory

Figure 3: Constitutional Reconciliation

Contemporary Critique

Constitutional morality overrides Manusmriti's inequalities, integrating its anti-fraud ethos into statutes like the 2019 Consumer Act for inclusive protection. This synthesis upholds justice while rejecting caste hierarchies, ensuring consumer rights serve egalitarian democracy³⁵.

The relevance of Manusmriti’s ethical approach to trade in addressing contemporary consumer issues, including digital fraud:

Manusmriti's ethical approach to trade, rooted in dharma (righteousness), emphasizes truthfulness, fair pricing, and prohibition of deceit, offering timeless principles to combat contemporary consumer issues like digital fraud. These align with modern needs for transparency and trust in e-commerce, where misrepresentation mirrors ancient bans on false weights. By prioritizing moral accountability over mere regulation, the text inspires ethical AI oversight and consumer education against scams³⁶.

Core Ethical Principles

Manusmriti mandates honest dealings, such as accurate representation of goods and just measures, fostering seller integrity akin to today's disclosure norms under the Consumer Protection Act, 2019. Violations invite social and royal penalties, promoting self-regulation

³⁴ Ibid

³⁵ <http://journals.sagepub.com/doi/10.1177/0003603X18780557>.

³⁶ <https://rrjiks.co.in/index.php/RRJIKS/article/view/13>.

that counters digital anonymity in fraud. This dharma-centric model encourages corporate social responsibility, reducing exploitation in online marketplaces³⁷.

Application to Digital Fraud

- **Truth in advertising:** Parallels anti-misleading claims laws, applicable to fake reviews and deepfakes on platforms like e-commerce sites.
- **Fair exchange:** State oversight prefigures digital regulators monitoring algorithms for bias or hidden fees.
- **Restitution focus:** Supports modern redress via consumer forums, extending to cyber-fraud compensation.

Contemporary Relevance

In digital eras, Manusmriti's ethics bridge gaps in enforcement by cultivating cultural aversion to fraud, complementing tech like blockchain for verifiable transactions. Challenges like caste hierarchies are transcended in secular adaptations, making it a foundation for sustainable, value-driven commerce amid global scams³⁸.

Issue	Manusmriti Ethic	Modern Digital Solution ³⁹
Misrepresentation	Ban on false goods	AI detection, labeling rules
Unfair pricing	Just measures enforcement	Price transparency mandates
Fraud redress	Dharma-based penalties	E-filing, class actions

Figure 4: Manusmriti ethic and modern digital solution

RECOMMENDATIONS AND FUTURE DIRECTIONS

1. Re-reading Manusmriti for Modern Use

Manusmriti should be treated as a historical source, not as binding law. Its useful rules on fair pricing, fraud control, and trader responsibility can be studied, but its caste- and gender-based discrimination must be rejected.

³⁷ Ibid

³⁸ <https://bssspublications.com/Home/IssueDetailPage?IsNo=695>.

³⁹ <http://journals.sagepub.com/doi/10.1177/0003603X18780557>.

Useful market-related ideas from Manusmriti and Arthashastra can be rewritten in a modern, rights-based form that follows constitutional values.

A concept of “Dharmic consumer protection” may be developed, but it must be fully subject to equality, dignity, and non-discrimination under the Constitution.

2. *Linking Ancient Ideas with Present Laws*

Ancient rules on fair prices, weights and measures, adulteration, and professional duties can be compared with the Consumer Protection Act, 2019 and related laws to show both similarities and differences.

Historical insights can support stronger duties for sellers, especially in essential goods and services such as health care.

Law-makers and courts may acknowledge India’s long tradition of consumer protection to improve public trust in modern reforms.

3. *Education and Consumer Awareness*

Consumer awareness should be strengthened, reflecting the ancient idea that the ruler must protect the public from unfair trade.

Legal education and judicial training should include critical study of ancient legal texts, without repeating their discriminatory aspects.

4. *Future Research and Policy Development*

Further research should examine how Manusmriti and similar texts are used today in political and judicial debates on market regulation.

Detailed studies may be done in sectors such as health, food, and digital platforms to see how ancient ideas of consumer and professional duties can guide modern consumer policies.

Global best practices in digital and data protection should be explored, while applying ethical values like honesty and fairness in a strictly constitutional and secular way.

5. *Safeguards and Critical Approach*

Any use of Manusmriti must clearly reject caste- and gender-biased rules, in line with constitutional principles.

Interdisciplinary research should clearly separate what is historically informative from what can be legally useful today, so that cultural revivalism does not weaken consumer equality and protection.

CONCLUSION

Ancient Indian law, including Manusmriti, contained a clear concern for fair trade, honest dealing, and state responsibility toward buyers, functioning as an early form of **consumer protection**. Modern Indian consumer law universalizes and secularizes these ideas within a rights-based constitutional framework, while rejecting Manusmriti's caste- and gender-based hierarchies. The critical task in a modern legal context is to separate and adapt Manusmriti's market-regulating and welfare-oriented insights from its discriminatory social order.

The Manusmriti's consumer protection elements serve as early indicators of legal attention to market ethics and consumer rights, but the evolution to the modern legal context represents a profound expansion in legal sophistication, scope, and enforcement capacity addressing complex consumer welfare needs in a dynamic economy.

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