
Critical Examination of Civil Law Approach to Consumer Protection in Nigeria

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ABSTRACT

Consumer protection law, being a novel area of study, is geometrically gaining momentum e providers, which is usually skewed towards the latter. Even the courts, avalanche of disjointed consumer protection statutes, voluntary organizations and regulatory agencies have not done enough to protect this vulnerable class of people in the society. More unfortunate is the fact that where an attempt is made at redressing the unscrupulousness of the producer or service provider, the inconsequential remedial measures within Nigeria's legal jurisprudence. Not until 1992, this area of study lacked a coherent legal framework to regulate the relationship between consumers of goods/services and producers of goods/service always be penal-based, therefore leaving the injured consumer without any form of compensation. In the light of the foregoing, this work is set to comparatively examine and appraise the civil law perspective of consumer protection law in Nigeria.

KEYWORDS: Civil Law Approach, Consumer Protection, Statutes and Nigeria

Introduction

The concept of consumer protection, as the name implies, is concerned with an act of safeguarding the interest of consumers from unscrupulous producers of goods and service providers. This term has been variously defined by learned authors, and has as its common denominator, the protection of consumers interest against all forms of exploitation and unfair dealings by the producers and suppliers of goods as well as service providers¹. This in effect implies that, effective regulation of manufacturers' activities and quality of consumer goods by relevant regulatory authorities through the implementation of the applicable laws is very crucial to the regime of sustainable consumer protection². This underscores the reason why consumer protection is given its place globally. For instance, Consumers International (CI), which is a federation of National Consumers' Association with the sole aim of promoting consumer protection all over the world has chosen March, 15 of every year as the World Consumers Rights

¹ See Monye F "Law of Consumer Protection" (Spectrum Books Ltd. Ibadan 2003) p.21, Daniel A. "Consumer Protection Law: Rights, Complaints and Remedies for Telecoms Consumers in Nigeria" (Amfitop Bok Co. Lagos 2018) p.36, Ekanem E. "Law of Consumer Protection & Hospitality Services in Nigeria" (Jemat Publishers. Ikot Ekpene 2019) p.2, etc. See also The Encyclopaedia American International Editdion: vol.7(Danbury, Connecticut:Globe Incorporated) 1981, p.682

² Odion, D. O. "The Impact of Consumer's Protection Laws and the Regulatory Schemes in Nigeria" *International Journal of Advanced Legal Studies and Governance* (vol.2, 2011) p. 140

Day (WCRD). This day is specifically set aside to protest abuses and injustices that undermine consumer protection.³

In the main, instead of protecting the innocent consumers, the government uses the instrumentality of the criminal justice system to ensure that unscrupulous producers are sanctioned⁴ as reflected in a number of statutes and decided cases (as shall be seen in the course of this work). However, the civil approach to the protection of consumers has not yielded the needed result, as most statutes are punitive in nature, thus, leaving the innocent consumer to suffer the injury or loss occasioned by the activities of an unscrupulous producer or substandard service provider.

The thrust of this work therefore is to examine the non-penal measures which the law has advanced to protect the vulnerable consumers of goods and services. This paper will also attempt to highlight some major institutional framework for consumers' protection, analyse the statutes relating to consumer protection, appraise the nature of legislation concerning consumer protection as well as proffer recommendations towards enhancing effective consumer protection and consumerism in Nigeria.

Institutional Framework for Consumers Protection

Various institutions are put in place to implement the provisions of the various laws for the overall benefit of the consumers. They are to basically ensure compliance with set standards of production of goods and provision of services so as to put on check, the prevalence of unwholesome and shoddy products and substandard services.

The following are the key agencies that are empowered by the enabling laws to regulate the operation of producers and service providers.

- ✚ The National Agency for Food, Drug Administration and Control (NAFDAC). This agency was created under Act No. 15 of 1993.⁵ The functions and powers of the agency are as specified in section 5 of the Act, which include but not limited to the following:
 - a. To regulate and control the importation, exportation, manufacturing, advertisement, distribution, sale and use of food, drugs, cosmetics, medical services, bottled water and chemicals.
 - b. The agency also conducts appropriate tests to ensure compliance with specifications designated and approved by the council for effective control of quality of food, drugs, cosmetics, etc.
 - c. It also undertakes investigations into the production premises and raw materials for good as well as their production processes in factories and other establishment.
 - d. It undertakes inspection of imported food, drugs, cosmetics medical devices and bottled water and chemicals.
 - e. It also undertakes the registration of the (a) above.

Today, it can be said that the organization has made tremendous achievements in the area of checking adulterated and contaminated food

³ Monye, F. "Tips on Consumer Protection". *Consumer Journal* vol. 3, 2007, p. 130.

⁴ Ekanem, E. E. "What remedy for the Consumer of Hospitality Service? *Nigerian Juridical Review*. Vol. 11 (2013) p.1

⁵ Established by NAFDAC Act, LFN 2004

and drugs. It should be noted that the Act empowers the agency to enter any premises which is reasonably believed to manufacture, preserve, package or sell any of the of the articles contemplated of by the Act for the purpose of examining same.

The agency reserves the right to seize and detain at any such time as may be necessary, any articles by means of or in relation to which it reasonably believed any provision of this Act or regulation has been contravened

- ✚ The Standard Organization of Nigeria (SON).⁶ This was set up with the objectives of standardizing methods in Nigerian industries and to provide other matters connected thereto⁷. A governing body known as the Standards Council of Nigeria was established to run the affairs of the organization.⁸ The functions of Council of Nigeria ranges from advertising the federal government on the national policy on standards and standard specification, designating establishing and approving standards in respect of certain matters specified in the Act to providing the necessary measure to quality control of raw materials and products.⁹

This body ensures that producers comply with set standards so as to ensure quality and safety of consumer's goods. It equally involves itself with laboratory testing and metrology activities. It also ensures that the quality of materials, equipment and treatment chemicals used for drinking water supply meet the required standards and system certification.

- ✚ Consumer Protection Council¹⁰: This is the primary legislation on consumer protection in Nigeria. This body was set up under the Consumers Protection Council Act¹¹ to among other things:

- (a) Provide speedy redress to consumers compliant through negotiation, medication and reconciliation.
- (b) Seeks ways and means of eliminating from the market hazardous products and causing offenders to replace such products with safer and more appropriate alternatives.
- (c) Publish from time to time, the list of products the consumption and sale of which have been banned, withdrawn or not approved by the government.
- (d) Cause an offending company, firm trade association or individual to protect, compensate and provide relief and safeguards to injured consumers or communities from adverse effects of technologies that are inherently harmful, injurious, violent or highly hazardous.

In the performance of its functions, the council is empowered to apply to court to prevent the circulation of aby product which constitutes an imminent public hazard. It can also compel the producer to certify that all safety standards are met in their products. The provisions of consumer's protection council will be

⁶ Established

⁷ See section 24 (1) of the Act

⁸ See the long title to CAP S9, LFN 2004

⁹ See section 3 (1) of the Act

¹⁰ Established by CPC Act, LFN, 1992

¹¹ Cap C25 LFN 2004

assimilated fully in the course of this work as we shall consider the civil law perspective of the consumer protection.

Statutes Relating to Consumer Protection

Before delving into highlighting the relevant statutes, it is pertinent to state that these functions most times overlap, thus creating room for replication. They include:

Weights and measures Act¹², NAFDAC Act¹³, SON Act¹⁴, SON Act¹⁵, Merchandise Marks Act¹⁶, Hire Purchase Act,¹⁷ Price Control Act¹⁸, The trade malpractices Act¹⁹, Food and Drug Act²⁰, The Criminal Code Act²¹

Nature of Consumer Protection Legislation

Consumer protection legislation are mainly penal-based, which are set up to punish offenders and not necessarily to compensate victims.²² This is geared towards the use of penal instruments to cage nefarious manufacturers or service providers and their agents so as to deliver the consuming public from their unwholesome activities²³. This approach therefore anticipates terms of imprisonment and, or fines as punishments against recalcitrant manufacturers or service providers²⁴. According to Ekanem²⁵, the method adopted by the penal legislation include: inspection, investigation, standardization and prosecution. Prosecution here is the last stage in the criminal justice system: which implies that, before prosecution takes place, t That is to say, the primary objective of criminal law approach to consumer protection is to guarantee the safety and interest of the general in the course of consumption, and not to provide redress mechanisms to consumers who have suffered in the process²⁶. No wonder a Consumer Law expert summed up the pitiable position of the injured consumers thus:

In the event of conviction, the stipulated fine or term of imprisonment is imposed on the offender. Thus, the victim goes without remedy even when he has been injured²⁷.

The crux of this work therefore does not centre on the penal nature of the relevant laws but to examine the remedial measures (if any) that the law provides to safeguard and

¹² Cap W. 3 LFN, 2004

¹³ No. 15 of 1993 now Chap. Ni. LFN, 2009

¹⁴ Cap. S9, LFN, 2004

¹⁵ Not present in the LFN, 2004

¹⁶ Cap. M10. LFN, 2004

¹⁷ Cap H4. LFN, 2004

¹⁸ Cap P28. LFN, 2004

¹⁹ Cap T.12. LFN, 2004

²⁰ Cap. F3. LFN, 2004

²¹ Cap. 77. LFN, 2004

²² Felicia money, "Enforcement of Consumer Protection Laws in Nigeria" (2007) vol. 3 No. 1. *Delta State University Law Review* 39 at P. 90

²³ Mkpoo, E. "Contemporary Issues in Consumer Protection Law in Nigeria" (2010) *Eket Bar Journal*, vo.1 No 2, p. 88

²⁴ *Ibid*

²⁵ Ekanem E. E (Note 4) p..3

²⁶ *Ibid*, p.4

²⁷ Monye, F. N. "Enforcement of Consumer Protection Laws in Nigeria" (Ibadan; Spectrum Books Ltd.2003) p.91

protect the unsuspecting consumers in their dealings with manufacturers and service providers.

Civil law perspective of the protection of consumers

Consumer protection is a modern phenomenon very typical of the 20th century. These laws were primarily enacted to regulate competition and ensure fair trade. The implication here is that, it was merely incidental that the consumer was protected thereof.²⁸

However, modern commercial society, which has witnessed the production, distribution and marketing processes of goods and services has given rise to consumers as a distinctive class of actors in the commercial sector, with the rights to challenge the focal points in commercial and business law.²⁹ To this end, the civil law approach to consumer protection becomes imperative. This civil law perspective which can be deduced in the law of contract and law of torts includes the following remedies: consumer group action, boycott, return of the price, damages, rescission and reinstatement, restitution and specific performance. From the law of tort perspective, a consumer can sue for tort of deceit where he has been deceived into buying an unsatisfactory products or can sue for negligence which arises from a breach of duty of care that the manufacture owes the consumer³⁰. Lord Atkin articulated the nature of the duty of care in the popular case of *Donoghue v Stevenson*³¹ thus:

A manufacturer of products which he sells in a form as to show that he intends them to reach ultimate consumer in the form as to show he intends them to reach the ultimate consumer in the form in which they left him with no reasonable possibility of intermediate examination and with the knowledge that the absence of reasonable care in the preparation or putting up of the products will result in an injury to consumer's life or property, owes a duty to the consumer to take a reasonable care.

The Constitution of the Federal Republic of Nigeria, 1999 (as amended) clearly stipulates the fundamental rights of citizens³², which includes the right to life. In the words of Ekanem, this right to life encompasses the right to safe consumption of food, water, air and services³³. Also, consumers have various internationally recognized rights, a breach of which is actionable. Such rights include: The right to the satisfaction of basic needs, right to safety, right to be informed, right to choose, right to choose, right to choose, right to be heard, right to redress, right to consumer education, right to a healthy and sustainable environment³⁴. From the foregoing, it can be seen that consumer protection issue should not be treated with levity, especially considering the possible dangers associated with adulterated and fake products which

²⁸ Oughton, D. W. Consumer Law: Text Cases and materials (London: Blackstone Press. Ltd:), 1991 at PP. 11-12.

²⁹ Samuel, G. "Civil and Commercial Law: A distinction worth making" (1986) 102 LQR 569.

³⁰ See for example, *Osemobor v Niger Biscuit (Nig.). Ltd* (1993) NCLR 382.

³¹ (1932) A. C. 562

³² Cap iv, CFRN, 1999 as amended, 2011

³³ Ekanem, E.E. "Law of Consumer Protection & Hospitality Services in Nigeria" (Ikot Ekpene. Jemat Publishers 2019) p.102

³⁴ Consumers International website. www.consumersinternational.org. accessed on 8th Dec; 2021

are on its own, life threatening³⁵. The Supreme Court supported this vulnerable state of the consumers in *Nigerian Bottling Co. v Ngonadi*³⁶ when it held;

Nothing appears to be more elementary in this country where it is often the unhappy lot of the consumers to be inflicted with shoddy and unmerchantable goods by pretentious manufacturers, entrepreneurs, shady middlemen and unprincipled retailers whose avowed interest seems only, and always, to maximize their profits leaving honesty a discounted and shattered commodity.

From the above exposition, one may be tempted to believe that the courts are truly out to protect the innocent consumers, whenever their rights are infringed upon. But a closer look would reveal that the attitude of a typical Nigerian court towards consumer protection has always been that of a cat and dog relationship as the courts would consider the principle of caveat emptor, privity of contract as well as placing a stricter onus on the innocent consumers to prove their cases beyond reasonable doubt. For instance, in *U.T.C. (Nig.) Ltd. v Maobison Interlink and Associates Ltd.*³⁷, the Court of Appeal ruled against the respondent who sought to reject a generating set after discovering that it was a refurbished one. The court, in line with the principle of caveat emptor, ruled against the respondent. Also, in *Kabo Air Ltd v Oladipo*³⁸, where the respondent's luggage lost in transit after being duly checked in, the Court of Appeal overturned the decision of the trial court solely on the grounds that the lost luggage was not weighed. It should however be noted that these rights are better displayed on the pages of paper like this, as many of the regulatory bodies mainly impose penal sanction while the unsuspected consumers are left unsecured and without any practical remedy.

The primary legislation that is aimed at protecting the innocent consumers is the Consumers Protection Act (CPA). For avoidance of doubt, section 2 (a) of the Act provides to the effect that: "The Council shall provide speedy redress to consumers complaints through negotiations, meditation and conciliation.

For the purpose of administrative convenience, the Act in section 4, creates in each state of the federation, a committee to assist the Council, which interacts directly with the consumers by Investigating and making prompt recommendation to the Council on matters complained of by the consumers. The implication here is that the aggrieved consumer can only ventilate his anger through lodging of complaint to the committee³⁹ while the enforcement of the provisions of the Act is vested in the Council and the Attorney General of the Federation⁴⁰. This on its own seems to pose an impediment to the prompt redress of consumers' complaints.

In practice however, not all States of the federation have these committees created. Moreso, the few States that have the Committees established cannot in anyway ameliorate the burden of the unsuspected consumers especially those in the non-urban

³⁵ Ekanem, E. E. (note) p,102

³⁶ (1985) 1 NWLR (pt 4) 739, p 753

³⁷ (2004) 10 CLRN

³⁸ (1990) 10 NWLR 517 C. A.

³⁹ Section 4(1) of the Act

⁴⁰ By the provision of section 16, the A.G.F may at the request of the council, apply to a court for an order commanding any person partnership, company, trade association or agent to comply with the provisions of the Act or any order of the council thereof.

areas. For the committees to achieve their set goals, it must be extended to all the local government areas so as to be accessible to consumers in the villages who may not only be unaware of the existence of such Committees but also lack the wherewithal to get to the State for the purposes of lodging their complaints.

In addition to penal provision, the court may make a compensation order requesting the person who has inflicted the injury to pay compensation for any personal injury, loss or damage resulting from the act or omission of the unwholesome producer.⁴¹ This is in line with the import of the provisions of section 8 of the Act which empowers the injured consumer to maintain an action for compensation or restitution in any competent court, in addition to the redress the council may have imposed.

It can be deduced that, by the express provisions of the relevant sections of this Act,⁴² the right to civil action for compensation is only maintainable subsequent upon the outcome of the committee's investigation. It is clear that the committee may decide in favour of the consumer or vice versa. That being the case, the delay in the investigation or no investigation at all may be an infringement on the right of the consumer to seek a redress in the court of law.

It is pertinent to state here that, apart from the penal nature of our statutes, the court of law itself has equally served as a bottleneck in the protection of consumers. This can be gleaned from a plethora of cases, in which the court would always seek the strictest proof and the onus of such proof is always on the consumers. The case of *In Dumuje v Nigerian Breweries Plc*⁴³, the plaintiff, who drank a bottle of Maltina, felt some solid substance in his mouth. On vomiting the object, it turned out to be a cockroach. He spent two days in the hospital. He then maintained an action against the manufacturers and retailers of the drink positing that he suffered from muscular tremor, stomach upset and impaired system. The court found for him and awarded the sum ₦2m as damages. This decision was plausible and worth celebrating as it was the first of its kind.

However, recent developments have shown that judicial attitude towards consumer protection in Nigeria seems to favour the unscrupulous producers at the expense of the vulnerable consumers. One therefore wonders if the court would have still maintained its position in Dumuje's case⁴⁴ should it come to the fore today. Thus, in the case of *Nigerian Bottling Co. Plc v Olarewaju*⁴⁵, the respondent purchased two bottles of coca-cola product of the appellant from a retailer. On drinking a bottle, he discovered some particles in both the bottle he had already opened and the unopened one. Barely after two days, he self-sick and on being discharged from the hospital, sued the appellant claiming the sum of ₦11,500.00 being medical expenses and ₦5,000.00 as special damages and ₦50,000.00 as general damages. The trial court gave judgement in favour of the respondent as plaintiff and awarded ₦11,500.00 as special damages and ₦50,000.00 as general damages. On appeal, the Court of Appeal upturned the decision and stated that the onus placed on the respondent to establish a nexus between the

⁴¹ See section 13 of the Act

⁴² Section 8 and 13

⁴³ Unreported judgement of the High Court of Delta State in suit No.EHC 1236194 delivered on 4/7/2001.

⁴⁴ *Supra*

⁴⁵ (2007) A11 FINLER (pt.364) 360

consumed coke and his ailment was not in any way discharged on a balance of probabilities.

Again in *Okonkwo v Guinness Nig. Ltd.*⁴⁶ The plaintiff drank a bottle of small stout and discovered that it contained some particles of roots, leaves and bark of tree. The plaintiff sued while relying on the principle of *res ipsa loquitur*. The court dismissed plaintiff's case and asserted that the plaintiff could not establish that the defendant was the manufacturer of that particular bottle of stout; and that he could not also prove when the drink left the manufacturer. The situation is the same services delivery like hospitality, transportation, telecommunications, etc. *Kabo's case*⁴⁷ is illustrative. Here, the respondent boarded the appellants' aircraft from Kaduna to Lagos. He successfully checked in his luggage and was issued with luggage tag. On landing in Lagos, he discovered that his luggage. In an action that ensued' the respondent got judgment in default of appellants' appearance and appellants' application to set aside the judgment failed.

On appeal, the court of Appeal, after deciding on the issues of jurisdiction of State High Court as well as the question of applicability of the Non-international Carriage (Colonies, Protectorates and Trust Territories) Order of 1953⁴⁸ as being applicable in Nigeria as an existing law, went ahead to decide and allow the appeal. This decision generated a lot of controversies. For instance, some commentators observed that, though it is not in doubt that the passenger lost his luggage, yet the legal system could not avail him any redress just because the passenger did not plead and prove the weight of his luggage. Meanwhile, it is common practice that luggages allowed into Aircraft Cabin are rarely weighed. Cases abound with similar facts in which the courts have not derailed in their position of findings for the manufacturers and service providers when unsuspected consumers run to the court for a redress⁴⁹.

However, the situation in other jurisdictions reveal a complete departure from the positions of the Nigeria Courts. In America for instance, strict liability is enforced against manufacturers who bring forth defective products for consumers' use.⁵⁰ In *Greenman v Yuba Power Production Inc*⁵¹, a man was injured while using an all purpose power tool given to him as a present by his wife. The injured man brought an action against the manufacturer. The Supreme Court of California, while holding that the manufacture is liable opined thus:

A manufacture is strictly liable in tort when an article he places on the market knowing that it is to be use without inspecting the defects, proves to have a defect that causes injuring to a human being...

⁴⁶ (1980) 1 PLR 583

⁴⁷ *Supra* (Note 38)

⁴⁸ The Order by which the Warsaw Convention became applicable in Nigeria.

⁴⁹ *Hill Station Hotel v Adeyi* (1996) 4 NWLR (Pt 442) 294 at p.312, *Nathaniel Ebelam v Guinness Nig. Ltd* (1983) 1 FNLR 42, *Boardman v Guinness (Nig) Ltd.* (1980) NCLR 109, *NBC Plc v Okwejimuior & Anor* (1998) 8 NWLR 295

⁵⁰ Odion, D. O. "The Impact of Consumers' Protection Laws and the Regulatory Scheme in Nigeria " (note 2) p. 145.

⁵¹ (1963) 3 ALR (commercial) 2006

Also, the East African case of *Mwanachi Service Station & (Tanzania) Ltd. V. Minga*⁵² is very instructive. Here, the East African Court of Appeal held that, where a manufacturer, a distributor or seller of goods has excluded liability with, or examination of, the goods by a consumer, he thereby brings himself into direct relationship with the consumer and so as to be responsible to the consumer for any injury the consumer may sustain as a result of negligence on the part of the manufacturer, distributor or seller as the case may be.

It is very doubtful if these cases were to be decided in Nigeria, that the consumers would be availed the redress sought for.

The current position in United Kingdom is that, where a court fails to make a compensation in a criminal matter, it must give a reason for not making the other.⁵³ A situation that is hardly applicable in Nigeria. In fact, most decisions of our courts are punitive-based while the injured consumers are left without any compensation. Generally, the Nigeria legal system has always shied away from the issue of compensation to victims of crime.⁵⁴

It should be noted that even the Act which we think has come to the aid of the innocent consumers, has derailed in line with the wordings of its provisions. Section 13 (1) uses the word "may" which presupposes the discretionary powers of the court. It therefore follows that; courts are not bound to award compensation to an injured consumer talk less of considering the quantum of such compensation.

Also, there seems to be no established standard of proof required for the consumer to prove his case. This is unlike the standard of proof in criminal matters which is 'proof beyond reasonable doubt.' One now wonders what the position would be where a consumer is a victim criminal act of a manufacturer and is also required to strictly prove his case, as seen in this work⁵⁵.

Conclusion

A cursory analysis of the relationship between the manufacturer /service providers and the consumers reveals that it is always skewed towards the former. This is not unconnected with the susceptible nature of consumers and the unequal bargaining power between the them coupled with disparity in knowledge. It is observed that most of the legislation are penal based, which do not in any way protect the vulnerable consumers. I strongly recommend that the National Assembly should make Civil-based laws to safeguard the protection of consumers in the competing market with clear cut policies on consumer protection.

It is not in doubt that one of the components of the fundamental right to life is the right to a healthy environment. Therefore, with the prevalence of food poisoning cases caused by unwholesome activities of producers, the Nigerian courts should adopt a more liberal and objective approach when such matter comes before them. Or, in its

⁵² (1973) 3 ALR (Commercial) 206

⁵³ See the Power of Criminal Code Act, 1988.

⁵⁴ Ehighelua, I. "Compensation for Consumers Affected by Criminal Conduct: A Ray of hope from the decision of the Court of Appeal in *Martins v. C.O.P.* (2005) NWLR (Pt 278) 1015, *Consumers Journal* Vol. 2, No. 1, 2006, p.25.

⁵⁵ For instance, see Okonkwo's case (*supra*) where the court of Appeal asserted that the respondent failed to show the nexus between the defendant and the said poisoned bottle of drink.

stead, there should be established a specialized court (a typical of an industrial court) which should have jurisdiction primarily on consumers-manufacturers/service providers' relationship.

Also, based on unequal working relationship between the producers and consumers in terms of literacy level, exposure and financial standing, the onus of proof should be shifted to the producers as is obtainable in developed countries and/ or the strictest proof approach should be relaxed so that the innocent consumers could always find it easy to pursue their cases.

As seen in the Act, the right of action of a consumer is subjected to the outcome of the States Committee's investigation. Without mincing words, this whittles down the propensity of a customer's redress seeking capacity. The provision requiring this a victimized consumer to first report his complaint to s State Committee should be expunged from the Act to pave way foe free access to court. Better still, it could be seen as a pre-action stage of litigation, whereby if the consumer is satisfied at that level, he refrains from further suit and vice versa.

Moreso, it is not in contention that so many of the consumers lack information concerning the products they are consuming, talk less of knowing their rights and the possible remedies that are accruable to them.

Recommendations

1. It is strongly advised that regular awareness campaigns, seminars, workshops and symposia be organised by the relevant bodies such as SON, CPC, etc. to well equip the consumers.
2. Finally, there should be a repeal of the present laws relating to consumer protection, as they are not only antiquated but cannot take care of the contemporary challenges of consumers. This should be immediately followed by a codification of the repealed consumer protection related laws into one document to be known as "Consumer Protection Code" or Consumer Protection Law" for ease of reference.

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A Critical Analysis of Motivational Teaching Strategies of Basic