



The Reform of Consumer Protection Law: Comparison of Indonesia, Vietnam, and Ghana

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Abstract

Consumer protection has become a major challenge in Indonesia, Vietnam, and Ghana, facing gaps in information, bargaining power, and access to legal justice, especially in the context of technological development and globalization. This research seeks to evaluate the comparison around consumer protection law between Indonesia, Vietnam, and Ghana and what legal reforms can be adopted in the case of Indonesia from best practices in Vietnam and Ghana. The study is normative legal research in which the conceptual and the regulatory approaches are utilized to assess the laws on consumers in Indonesia, Vietnam, Ghana, and by examining of different legal documents i.e. primary, secondary, and tertiary sources and after that employing descriptive qualitative analysis on the data. The results show that countries, including Indonesia, Vietnam, and Ghana vary widely across and between themselves regarding the nature of the laws, the supervision exercised, and even the enforcement of the laws. Indonesia is guided by the Consumer Protection Law (UUPK) with BPKN and BPSK as the overseeing bodies, while Vietnam is guided by the Law on Protection of Consumer Rights (LOPCR) which is enforced by the VCCA. Ghana which is now developing a Consumer Protection Act is guided by the Food and Drugs Authority (FDA) in enforcing product supervision. All the three countries have a low consumer population even where the law is enforced, and this has developed into a problem. In making practices and market interactions in Indonesia more transparent, it could apply solutions from Vietnam on information sharing and electronic dispute resolution and also consolidate the position of BPKN as it was done in Ghana in order to afford more efficient control over and defense of a digital marketplace against illicit activities.

Keywords: *Consumer Protection, Consumer Rights, Reform, Regulation.*

A. INTRODUCTION

Guarantees of consumer rights are essentially part of the broader development of human rights guarantees. Although initially the concept of human rights was related to the dominance of political rights, over time, human rights have also encompassed consumer rights, especially in relation to the increasingly massive development of the economy and business (Prasetio, 2023)(Roslan et al., 2022). Consumer rights as a manifestation of human rights have rapidly developed as a means to provide protection for consumers. Consumer protection is important considering that in economic or business transactions, the bargaining position of consumers is often lower compared to producers or business operators themselves (Fibrianti et al., 2023).

Consumer protection is a fundamental aspect in realizing economic justice and balance between the interests of business actors and consumers. There's no denying the fact that consumers are seen as the major driving force in the economy as they are the central figure in any economic system (Syam et al., 2021). However, the respect and stature of the consumer is oftentimes compromised because of the lack of a proper balance when it comes to information, legal justice, and bargaining power (Macaulay, 1979). With the changing dynamics of globalization, consumerism and technology, countries such as Indonesia, Ghana and Vietnam have struggled to protect their consumers. Indonesia is a country with a massive consumer base and a growing economy, and such growth makes it harder for the country to tackle consumer protection issues. Hence, the Law Number 8 (UUPK) should be put into perspective. However, the adequacy of UUPK within the legal needs has been challenged as many

argue it is not suited for modern day consumerism. This is especially true with the growing use of international trading and sophisticated digital multiples.

Similar things also happen in Vietnam, which has a socialist-based consumer protection approach with the characteristics of a growing market. Ghana, on the other hand, as a developing country in Africa, faces unique challenges in building a legal framework that can protect consumers amidst the dominance of informal markets and limited legal infrastructure (Acheampong et al., 2018). In Indonesia, the implementation of UUPK faces implementation obstacles, such as low consumer awareness, weak law enforcement, and limited access to dispute resolution mechanisms. This is reflected in the many cases of consumer rights violations that have not been handled adequately, both in the context of conventional and digital transactions. Amidst all these, Vietnam has gone forward by updating of its consumer protection policy through a new law that is more in tune with the global market trends (Ha, 2024).

On its part, Ghana, even though it has its peculiar problems, is striving to enhance consumer protection through reinforcing the institutional framework and the regional dimension. The study also draws on the fact that all three countries face similar challenges, albeit in different contexts. All three must balance consumer protection with the need to create a conducive investment climate. In Indonesia, e-commerce is a rapidly growing sector, but it often raises new issues, such as online fraud, data privacy, and counterfeit goods. In Vietnam the enforcing of law becomes the greatest challenge when coupled with the changing consumption (Lanh et al., 2022), while Ghanaians on the other hand, focus on providing legal services to rural areas, which are often excluded from any institutional framework (Nsubuga et al.,

2024). When one peers through Indonesia, Vietnam and Ghana, what they see is the interplay and merging of cultures, societies and economies and how these factors influence the manner in which such a nation addresses consumer protection concerns.

In this context, Vietnam can be mentioned as a Southeast Asian country that has managed to effect notable improvements in the field of consumer protection legislation. In Africa, Ghana offers crucial lessons on how a legal structure can be developed through home grown strategies. Indonesia as a multi-ethnic and multi-cultural country can benefit authoritative instructions from both countries to strengthen consumer protection policy which is more comprehensive and operational. In addition, this study is also relevant in the context of globalization and international economic integration. Trade cooperation between developing countries such as Indonesia, Vietnam, and Ghana requires harmonization of consumer protection regulations in order to create justice and legal certainty. In the absence of efficient reforms, these countries' consumers risk remaining vulnerable while foreign or local business players with big capital will find ways to exploit the law against them.

The changing technological environment necessitates changes to the consumer law in an increase manner. Cross-border transactions conducted online often present new challenges for national laws. By considering the differences in legal characteristics and challenges of each country, this study aims to analyze how consumer protection law reform can be carried out effectively. This study also aims to provide practical recommendations for policymakers in Indonesia, Vietnam, and Ghana, based on a comparative study of the successes and failures of consumer protection policies in the three countries. Consumer protection is not only a legal issue, but also an economic, social, and political issue that requires a holistic and

comprehensive approach. Reform of consumer protection laws in Indonesia, Vietnam, and Ghana is a strategic step to strengthen the position of consumers while creating a fair and sustainable market.

Research on consumer protection has indeed been conducted by several previous researchers, including the study by Bashir, et al. (2023), which discusses the importance of legal awareness education related to consumer rights as a primary means of enhancing consumer protection in Pakistan (Sobia Bashir, Abdus Samad Khan, 2023). Another study was conducted by Ballaji (2024) which analyzes the importance of consumer protection in the digital era, especially when transactions are often carried out through digital payments (Ballaji, 2024). Further research on consumer protection was also conducted by Naseeb Khan (2024), who studied the protection of consumer personal data in digital transaction practices (Khan, Wajahat Naseeb, Naseeb, 2024). In general, the three previous studies focused on the analysis of consumer protection aspects in specific fields. This research differs from the three previous studies because, in addition to focusing on general consumer protection, it also uses a comparative legal perspective with other countries, making it a basis for comparison and recommendations related to consumer protection efforts.

The aim of this case study then is formulated as a problem as follows (i) how do consumer protection regulations in Indonesia, Vietnam, and Ghana compare in protecting consumer rights? and (ii) what legal reforms can be implemented in Indonesia by studying the practices of Vietnam and Ghana in improving consumer protection?.

This study uses a normative legal research method. This method aims to analyze legal rules, legal principles, and legal norms that apply in each country in the

context of consumer protection (Marzuki, 2017). There are two main approaches employed in this research which are conceptual approach and legislative approach. The conceptual approach seeks to explain the concerns surrounding consumer protection with its possible contributions towards the enactment of legal norms in different jurisdictions while the legislative approach is employed to examine and contrast the legal provisions in Indonesia, Vietnam and Ghana.

The sources of legal materials used in this study are classified into three categories namely primary, secondary and tertiary legal materials. The constitutions outlining the general rule of law as well as relevant laws and regulations that are currently operative in Indonesia, such as Law Number 8 of 1999 concerning Consumer Protection, and legal frameworks in Vietnam and Ghana fall under primary legal materials. For the sake of these materials, other primary legal materials are those international conventions which are relevant to the matter. On the other hand, secondary legal materials encompass published works such as books, scientific journals, articles, and reports which address consumer protection issues in the three studied countries. On the other hand, tertiary legal materials contain supporting documents on the topics under study like legal dictionaries, encyclopedias, and many others. The data collection technique employed in this research was document studies, or what others called library research. This means that researchers gathered different laws, legislation, legal opinions and other relevant materials to support the conducted comparative research. Using document studies enables the researcher to use credible and reliable facts to provide the best understanding of the consumer protection legislations in Indonesia, Vietnam and Ghana.

The technique of data analysis applied in this research is qualitative descriptive analysis. The investigator examines the legal provisions from the three countries and the variations and uniformities present while isolating best practices that may be implemented in Indonesia. The result of such analysis is subsequently used to put forward suggestions as to relevant and feasible legal reforms which will enhance the protection of consumers in Indonesia in a global perspective.

B. RESULT AND DISCUSSION

1. The Comparison of Consumer Protection Regulations in Indonesia, Vietnam, and Ghana in Protecting Consumer Rights

In Among instruments for maintaining equilibrium between the rights of the consumers and business operators around the world, consumer protection remains basic (Matnuh, 2021). Consumers are often in a weak position compared to business actors, either due to limited access to information, weak bargaining power, or unfair business practices (Goldring, 2006). Therefore, the state has an important role in creating a legal system that guarantees consumer rights, promotes justice, and prevents losses arising from violations. This research uses legal comparison with an emphasis on the dimension of functional legal comparison, which is a legal comparison that determines the country where the legal comparison is conducted in a specific field or aspect, in this case, the legal comparison in the field of consumer protection (Dicky Eko Prasetio, 2022)(Matnuh, 2021).

A comparison of consumer protection regulations in Indonesia, Vietnam, and Ghana is an interesting study because each of these countries has a different level of economic development, legal structure, and challenges. The following is a summary

in table form related to the main differences in consumer protection between Indonesia, Vietnam, and Ghana.

Table 1. The Differences in Consumer Protection between Indonesia, Vietnam, and Ghana

Aspect	Indonesia	Vietnam	Ghana
Key Regulations	Law No. 8 of 1999 concerning Consumer Protection (UUPK)	Law on Protection of Consumer Rights (LOPCR), 2010	Does not yet have a Consumer Protection Act
Supervisory Bodies	BPKN, BPSK	Vietnam Competition and Consumer Authority (VCCA)	Food and Drugs Authority (FDA), Competition Commission
Key Challenges	Lack consumer awareness, weak supervision	Low consumer awareness, multinational corporate oversight	Weak legal infrastructure, lack of resources
Dispute Resolution	BPSK, general litigation process	National and local Consumer Dispute Resolution Agency	Still limited, especially in rural areas
Digital Innovation	Not strong enough in regulating digital transactions	Advanced online dispute resolution	There are specific regulations for digital consumer protection
Best Practices	Strengthening SNI for product quality	Transparency of information and after-sales service	Protection of personal data and right to return products

(Source: Author's Analysis)

The following table summarizes the important articles of consumer protection regulations in Indonesia, Vietnam, and Ghana.

Table 2. The Summary of Consumer Protection Regulations in Indonesia, Vietnam and Ghana

Country	Regulation	Article	Contents of Regulation
Indonesia	Law No. 8 of 1999 concerning Consumer Protection	Article 4: Consumer Rights	Consumers have the right to comfort, security, safety, correct information, and compensation for losses.
		Article 7: Obligations of Business Actors	Business actors are required to provide correct, honest and clear information and provide after-sales services.
		Article 45: Dispute Resolution	Dispute resolution can be carried out through the BPSK or a general court.
Vietnam	Law on Protection of Consumer Rights, 2010	Article 8: Consumer Rights	Consumers have the right to receive accurate information, product safety, and compensation for losses resulting from defective products.
		Article 22: Obligations of Business Actors	Business actors are required to provide product warranties, not manipulate information, and protect consumers' personal data.
		Article 27: Dispute Resolution	Consumer disputes can be resolved through consumer dispute resolution bodies at local or national levels.

Ghana	Ghana Public Health Act, 2012	Part 103: Prohibition of Hazardous Products	Prohibiting the circulation of dangerous food and drug products.
		Part 113: Product Labels	Products must have labels with clear and non-misleading information.
	Ghana Data Protection Act, 2012	Article 18: Protection of Personal Data	Regulating consumer rights to personal data protection, including the requirement for business actors to maintain data security.

(Source: Author's Analysis)

Indonesia as a developing country in Southeast Asia has a fairly strong consumer protection legal framework through Law No. 8 of 1999 concerning Consumer Protection. Meanwhile, Vietnam, which is also a developing country with a rapid economy, implemented the Law on Protection of Consumer Rights (LOPCR) in 2010 as its main regulation. On the other hand, Ghana, as a country in the West African region, is still struggling to build a comprehensive consumer protection legal system even though several institutions such as the Food and Drugs Authority have been actively conducting supervision. This comparison deals with the identifying of fundamental issues which in the context of the three nations regarding the regulatory approach, implementation, challenges, and effectiveness of consumer rights protection. Indonesia's consumer protection law is enacted and reinforced by the Law No. 8 of 1999 concerning Consumer Protection (UUPK). UUPK is introduced due to the extreme in picture and the power of consumers and business actors, which makes consumers suffer in most cases.

In accordance with UUPK, a minimum of four basic rights of a consumer are recognized, including but not limited to the access to comfort, security and safety in consumption of goods and/or services, the right to receive accurate information, the entitlement to make informed decisions, and the obligation to provide remedy for damages incurred. In addition, UUPK also stipulates the obligation of business actors to act honestly, responsibly, and transparently in offering products and services. Violations of consumer rights in Indonesia can be resolved through general judicial mechanisms or through the Consumer Dispute Resolution Agency (BPSK) which is formed in various regions. BPSK is tasked with resolving consumer disputes outside the courts in a simpler, faster, and cheaper manner. However, the implementation of consumer protection in Indonesia still faces various challenges.

First, consumer awareness of their rights is still low, so many violations go unreported supervision. This comparison deals with the identifying of fundamental issues which in the context of the three nations regarding the regulatory approach, implementation, challenges, and effectiveness of consumer rights protection. Indonesia's consumer protection law is enacted and reinforced by the Law No. 8 of 1999 concerning Consumer Protection (UUPK). UUPK is introduced due to the extreme in picture and the power of consumers and business actors, which makes consumers suffer in most cases:

1. **Low Consumer Awareness:** Many consumers are unaware of their rights or are reluctant to report violations.
2. **Weak Law Enforcement:** Enforcement of sanctions against violating business actors is often ineffective.

3. Infrastructure and Resource Limitations: Regulatory institutions often have limited capacity to monitor the market as a whole.

Consumer protection laws are on focus in each country and countries such as Indonesia, Vietnam and Ghana have provided diverse schools of thought. First, it can be estimated that Indonesia has included international standards even without having a consumer protection law by using Law No. 8 of 1999. It implies that consumers are active market participants in asserting their rights, and assists in the legal framework of determining the roles of consumer's rights and business people's obligations in various areas of the business relationship (Dalimunthe, 2021). Concerning Vietnam's experience, Vietnam's Communist regulations on consumer rights protection, which were integrated more into general policies of protection of market economy conditions (N. A. Nguyen, 2022). So, it can be concluded that in Vietnam, there was progress in updating certain social ideologies in terms of integration marketing (Minh Ha et al., 2022). The situation is quite the opposite in Ghana where there is no enactment of pure Consumer Legislation, however consumer operations are guided by specific provisions located within wider statutes on substantive issues like the Public Health Act and the Data Protection Act (Kruk et al., 2018).

The similarities are that all three seek to provide consumer protection in the context of globalization challenges, albeit with different legal frameworks. However, Ghana stands out in its sector-based consumer protection approach (such as health), while Indonesia and Vietnam are more comprehensive in providing an integrated legal framework. Sociologically speaking, and in relation to the Indonesian and Vietnamese contexts for example, there are notable differences in the level of consumers' awareness and the challenges faced by the communities in these countries in enforcing

their rights. Consumers in these two nations are, as a matter of fact, more informed of their rights, nevertheless numerous people do not file a complaint of a breach due to the lack of information or fear of the trial (Karimova et al., 2023). In Ghana, uncontrolled awareness is rather poor, predominantly in the hinterlands that are not serviced by the formal supervision infrastructure (Awolorinke et al., 2023).

All the three countries suffer from poor regulatory supervision and weak law enforcement. However, Vietnam has an advantage over these countries in the adoption of legal change due to sociocultural discipline, for instance, vigorous education campaigns. Ghana, on the other hand, has taken a more assertive stance to engage with civil society and media to enhance consumer education. From a wider perspective, target consumer protection in all three jurisdictions stems from justice, balance, and economic viability. As indicated by a legal scholar Dewi et al., consumer protection in Indonesia is built on the principles of Pancasila which allows for justice among consumers and business people, viewing the creation of a balance of rights and obligations.

In a country like Vietnam however, protecting consumers is much more focused on the societies well-being which is indicative of the regulations imposed on business practitioners (N. A. Nguyen, 2022). Alternatively, in Ghana, much of the policies that govern the relationship between a consumer and producers are tailored more around consumer's basic social needs for example transparency and safety of the products during transactions (Naatu et al., 2024). The important thing to note however is that all three countries share one common stance: consumers are vital players in the economy and hence the well-being of the economies is highly dependent on the protection of the consumers. Where they differ then, is how the focus is implemented;

where Indonesia concentrates on improving legal frameworks, Vietnam maintains a focus on educational and supervisory roles, while Ghana relies more on multi-sector approaches.

While endorsing different approaches towards achieving consumer protection sprouting from globalization and digitalization, Indonesia, Vietnam, and Ghana have one unifying goal in common. Each of these countries however, will want to take steps in dealing with specific issues that will play a role in fostering a more self-sufficient consumer protection environment. As the economic and legal conditions vary from country to country, consumers protection regulations in Indonesia, Vietnam and Ghana evolve, albeit differently. Indonesia and Vietnam already had quite a legal foundation, however, actual practice at the field needs to be further improved. On the other hand, Ghana is still working to develop a better consumer protection system. Focusing on shared challenges like improving consumer knowledge, enhancing regulatory agencies, and improving law enforcement and compliance, vision of these three countries can come into effect, creating a better and fairer market environment for consumers.

2. Legal Reform in Consumer Protection in Indonesia: Lessons from Vietnam and Ghana Practices

Consumer protection is a crucial issue in efforts to create a fair and sustainable economy. Amidst the rapid development of the global economy, consumer protection must be able to answer the challenges of the times, such as increasing digital transactions, information transparency, and the effectiveness of law enforcement. In Indonesia, Law Number 8 of 1999 concerning Consumer Protection is the main legal basis that regulates the rights and obligations of consumers and business actors.

However, after more than two decades of being enforced, various challenges still arise in its implementation. Weak supervision, low public awareness of consumer rights, and minimal access to consumer dispute resolution indicate the need for more progressive legal reform. To improve the consumer protection system, Indonesia can learn from other countries that have similar challenges but have successfully implemented significant reforms, such as Vietnam and Ghana. Both countries, although classified as developing countries, have shown innovation and progress in building stronger and more adaptive consumer protection policies.

Vietnam's practices emphasize transparency of information and rapid dispute resolution, while Ghana focuses on strengthening supervisory institutions and consumer protection in the digital sector. Lessons learned from these two countries can be an inspiration in formulating legal reforms in Indonesia so that consumer protection can be more effective, inclusive, and efficient. Vietnam is one of the countries in Southeast Asia that has successfully shown progress in the field of consumer protection. The Vietnamese government passed the 2010 Consumer Protection Law, which is an important milestone in guaranteeing consumer rights. This law was drafted with reference to basic principles that apply internationally, such as the right to information, the right to product safety, and the right to resolve disputes (Dalimunthe, 2021).

There are several important aspects of consumer protection practices in Vietnam that can be adopted by Indonesia in its efforts to reform the law. First, more specific and integrated regulations. Vietnam has implemented a policy that requires business actors to provide clear, accurate, and transparent information about the products or services they offer. This information includes details of prices, product

composition, health impacts, and environmental safety aspects. In addition, regulations in Vietnam also strictly prohibit misleading business practices, such as false advertising or products that do not match the description. Business actors who violate these provisions can be subject to administrative sanctions up to criminal sanctions (Kassahun et al., 2023). Indonesia needs to reform the Consumer Protection Law by clarifying business actors' obligations regarding information transparency. This is especially relevant in the digital era, where consumers often do not have direct access to verify products offered through e-commerce. For example, additional regulations could require e-commerce platforms to provide more detailed and accurate product descriptions and easy return mechanisms in the event of non-conformity. In addition, sanctions against business actors who commit fraud or misleading advertising should be enforced more firmly (Hamamah & Soekarno, 2021).

Second, the establishment of a more effective consumer dispute resolution body. Vietnam has a Consumer Dispute Resolution Body spread across the national and local levels. This institution acts as a mediator to resolve disputes between consumers and business actors outside the courts. Dispute resolution through this body is faster, cheaper, and more efficient than the often protracted litigation process in court. This body is also equipped with an online mechanism to facilitate remote dispute resolution. In Indonesia, the existence of the Consumer Dispute Resolution Agency (BPSK) needs to be strengthened. Access to BPSK is still limited in some areas, making it difficult for consumers in remote areas to obtain justice. In addition, the mediation process often takes a long time due to limited human resources and technology. Therefore, Indonesia can learn from Vietnam by developing an online dispute resolution platform that allows consumers to file complaints quickly and

easily. The government also needs to ensure that BPSK decisions have binding legal force so that business actors comply with them. Third, consumer education and literacy campaigns. Vietnam is very active in increasing consumer awareness through various education campaigns.

The government works with the media, non-governmental organizations, and educational institutions to organize socialization programs that educate the public about their rights as consumers (T. Nguyen, 2022). This effort seeks to foster an empowerment agenda for consumers so as to enable them protect themselves against adverse business practices. Indonesia, likewise have to align their approach in this regard, by extending consumer literacy programs to the grassroots. These educational programs should impart the knowledge about the consumers' rights, how to report infringements, and what safe (legal) products are (Fibrianti et al., 2023). So, consumers' behavior in Indonesia will be more active in demanding their rights and will influence business people to be more responsible. Another country in West Africa which should be noted in the area of consumer protection is Ghana as one of the developing countries. The government of Ghana has undertaken numerous legal changes aimed at providing consumers with protection especially through the strengthening of regulatory agencies and responding to the change of the digital environment (Odoi, 2022).

First, strengthen the authorities that exercise consumer regulation. Ghana has the Consumer Protection Agency (CPA) which is an autonomous body responsible for the regulation of marketplace activity, ensuring compliance of businesses with consumer protection laws. The CPA has all the powers to carry out periodic inspection, product verification, as well as respond to instances where violations of directives have

been reported. In cases where violations are established, the CPA has powers to impose administrative measures such as fines, suspension of licenses and public notices relating to the conditions and circumstances under which competition was violated. This step targets exercising deterrent effect on business actors And at the same time, inspire confidence to the consumers towards the products in the market (Judijanto, 2024). Indonesian experience should be strengthened by learning from Ghana National Consumer Protection who should be fostered with wider powers. BPKN's present function is more of an administrator, enforcing the law continues to be to a certain degree limited.

In order for the Indonesian legislation to be effective, it must make provision for BPKN to be empowered to conduct inspection visits on business operators at regular intervals within the two-phase integrated management plan. The exploration can concentrate on intra-Nigeria and inter-Nigeria activities focusing on sensitive areas of child abuse; medicine and food; E commerce; and so on. Other issues that may concern the GH focus are also covered. The Ghanaian Experience: Improving consumer welfare in the course of integration, development and debt relief. There are many reasons why consumers should be protected which concern the economy and aggregate welfare (Nazran et al., 2022). Legal rules present for the benefit of the consumers and the producers and also propel healthy growth of the digital economy. A case is made for Ghana setting up new subsidiaries to carry out future E-commerce activity which is important for the development of any economy. E-commerce has led to rapid growth in India further students need to reform existing law for achieving the growth from the world's largest e-commerce market in the years to come. This kind of regulation ought to prohibit the unfair and restrictive practices of consumer product

returns, the unfair practices of securing one's personal data and privacy as well as the ability to sort out issues in a fast and clear manner through online services.

Thirdly, regulation of e-commerce platforms whereby outside interference might obstruct the protection and privacy of consumer data, must also be strict (Erniyanti, 2024). Third, collaboration with civil society and the media. Particularly, in Ghana, the NGOs, civil society and the media play a huge role in the enforcement of consumer protection laws. Consumer protection is a focus of work for some non-governmental organizations (NGOs) who work 'on the ground' through education of consumers about their rights and responsibilities (Noor et al., 2021). At the same time, media serve as free advocacy against harmful business practices that negatively affect consumers. Indonesia can take a leaf out of the same book by expanding the frontiers for consumption civil societies and media's efforts. Adequate whistle blower protection programs may also be put in place to cover the whistle blowers (Suharyono, Khalisah Hayatuddin, Muhamad Sadi Is, 2024). In addition, they can also hope for the formation of interrelations of control bodies, non-governmental organizations and the press in order to enhance the control over economic actors.

Reforming Indonesia's laws is crucial for addressing issues in the context of globalization and the digital age. If we analyze the experiences of Vietnam and Ghana, we find that there is a need for multifaceted strategy in safeguarding consumers which entails establishing robust enforcement mechanisms as well as engaging partnerships . From Vietnam, Indonesia can learn about the importance of information transparency, rapid dispute resolution, and consumer literacy campaigns. In contrast, from Ghana, Indonesia can adopt a model of enhancing the supervisory bodies, protection of consumers in the internet space, and the involvement of civil society.

Such changes would eventually improve Indonesia's status to actually provide an efficient and equitable access or resource-based mechanisms of protection of consumers. These efforts will not only defend the rights of consumers, but also stimulate business actors to behave more responsibly, creating a healthy and sustainable economic ecosystem.

C. CONCLUSION

The protection of consumer rights is one of the most significant aspects of the functioning economy in the world. For Indonesia, Vietnam, and Ghana, progress toward the goal of consumer protection is quite distinct. Due to the economic status, legal structures and their enforcement in every country. Indonesia has Law No. Good of 1999 regarding Consumer Protection (UUPK) Law that provides a fundamental basis for regulating consumer rights with oversights from agencies like National Consumer Protection Agency (BPKN), and the Consumer Dispute Resolution Agency (BPSK). On the other hand, in Vietnam, the law on the Protection of consumer rights (LOPCR) has been in force since 2010 with the Vietnam Competition and Consumer Authority (VCCA) taking a proactive part. In contrast, these two countries, Ghana is still trying to out up more structures for it does not have and enacted consumer Protection Act. However, agencies like Food and Drugs Authority (FDA) do some work ensuring safety of products on the market. In practical terms these three countries experience the same state of affairs – general legal frameworks being ineffective in practice due to low consumer education, poor implementation of laws and rules, and scarce infrastructure and supervisory capacities.

Consumer protection law reconstruction in Indonesia can borrow depends on Vietnam and Ghana in that order of priority and specific guidelines. From the Vietnamese experience, first, Indonesia can implement further regulations concerning information disclosure, such as requiring business actors in the digital sector to make product information presented to consumers accurate, correct, and easy to understand. Furthermore, it is also necessary to enhance and encourage prompt resolution of disputes through the establishment of an online forum for quick resolution of issues between consumers and business entities. From Ghana, it is possible to strengthen the legal mandate of the National Consumer Protection Agency (BPKN) to take greater initiative in supervision of the markets, effective auditing of products, and application of the legal framework. Other reforms include consumer protection in terms of digital transactions including in such areas as personal data protection, reasonable product returns, media and civil society involvement in business activity oversight. In combination, these practices can enable Indonesia to encourage development of a consumer protection system which is appropriate to the realities and needs of the digital century.

The government must implement legislative changes to ensure better consumer protection in Indonesia by learning from experiences which have been effective in various countries such as Vietnam and Ghana. First, amendments in the Consumer Protection Act must define the idea of transparency in business activities of the market players in particular the digital market and also provide for methods on how discontent of users can be dealt with and resolved effectively through the internet. Second, the powers of BPKN need to be increased in such a way that it carries out regular monitoring and strict enforcement of the laws against offenders. Also, in particular,

the rights of consumers' data and privacy, the right to return bought goods and other terms and conditions related to e-transactions should be detailed further. The involvement of the media, civil society and NGOs must also be a priority for the government in order to boost consumer control. In this way, the system of protecting consumers in Indonesia will become more efficient, more responsive and fairer.

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