

CENTRAL CONSUMER PROTECTION AUTHORITY

Krishi Bhawan, New Delhi – 110001

Case No.: CCPA-2/5/2024-CCPA

In the matter of: Amazon Seller Services Private Limited - Sale of sweets on its e-commerce platform under the misleading advertisement/claim of being 'Shri Ram Mandir Ayodhya Prasad

CORAM:

Smt. Nidhi Khare, Chief Commissioner

Shri Anupam Mishra, Commissioner

Appearance on behalf of Amazon Seller Services Private Limited:

1. Mr. Vivek Ayyagari
2. Ms. Mythili Girish
3. Mr. Saikrishna Rajagopal and
4. Mr. Manas Raghuvarshi (Counsels on behalf of Amazon Seller Services Private Limited)

Date: 04.08.2026

FINAL ORDER

1. The present matter arises from a representation dated 19th January 2024 made by the Confederation of All India Traders (hereinafter 'CAIT'), addressed to the Hon'ble Minister for Commerce & Consumer Affairs, Government of India, and forwarded to the Central Consumer Protection Authority (hereinafter 'CCPA' or 'the Authority') by the Department of Consumer Affairs. CAIT alleged that Amazon Seller Services Private Limited (hereinafter referred to as the 'Opposite Party'), which operates the e-commerce platform www.amazon.in, was facilitating and enabling deceptive trade practices by permitting the listing and sale of commercially produced

sweets under the false and misleading label of '**Shri Ram Mandir Ayodhya Prasad**'. It was alleged that the said products were being marketed as an exclusive offering tied to the revered Shri Ram Janmabhoomi Mandir, Ayodhya, without any authorization, affiliation, or endorsement from the temple or the Shri Ram Janmabhoomi Teerth Kshetra Trust, thereby exploiting the deeply held religious sentiments of devotees and consumers across the country for commercial gain.

2. Upon preliminary inquiry of the said representation, the Authority observed that multiple sweets and food products were being actively listed and sold on the Opposite Party's platform (www.amazon.in) under names prominently incorporating the phrase 'Shri Ram Mandir Ayodhya Prasad'. The following products, all listed by seller M/s Chandu Trading Company and bearing the brand 'Bihar Brothers' (manufactured and packed by BiharBrothers®, Ayodhya, UP), were found to be live on the platform as of the date of the Show Cause Notice (19th January 2024):

- i. *Sri Ram Mandir Ayodhya Prasad – 250 Grams, Raghupati Ghee Ladoo (Type 1 Prasad – Pack of 1x250g) – ASIN: B0CQXJ13HN – listed at ₹299,*
- ii. *Ayodhya Ram Mandir Ayodhya Prasad – 250 Grams, Khoya Khobi Ladoo (Type 3 Prasad – Pack of 1x250g) – ASIN: B0CRJM2PVD – listed at ₹350,*
- iii. *Sri Ram Mandir Ayodhya Prasad – 250 Grams, Ghee Bundi Ladoo (Type 4 Prasad – Pack of 1x250g) – ASIN: B0CRJXVVLF – listed at ₹350, and*
- iv. *Sri Ram Mandir Ayodhya Prasad – 250 Grams, Desi Cow Milk Peda (Type 5 Prasad – Pack of 1x250g) – ASIN: B0CRJZWQKB – listed at ₹385.*

3. All four products were categorized under 'Grocery & Gourmet Foods' Sweetmeats' and were available for nationwide delivery. The product listings prominently used religious imagery, Hindi slogans referencing Lord Ram and

the city of Ayodhya on the packaging, and marketing language asserting that the products carried "Blessings from Shree Ram Janam Bhumi Temple, Ayodhya," thereby creating a false and misleading impression of an association with the temple. Significantly, the ingredient column across all product listings declared the ingredient simply as "Ram Mandir Prasad" a patently misleading and non-factual description of the actual contents of the product.

4. The Central Consumer Protection Authority has been established under Section 10 of the Consumer Protection Act, 2019 (hereinafter 'the Act' or 'CP Act') to regulate matters relating to violation of consumer rights, unfair trade practices, and false or misleading advertisements prejudicial to the interests of consumers and the public, and to promote, protect, and enforce the rights of consumers as a class. The Authority is vested with the power to issue directions and impose penalties in the interest of consumer protection.

5. The Authority, upon receipt of the representation of CAIT, took immediate cognizance of the matter recognizing the extraordinary sensitivity and gravity of the issues involved. The representation disclosed that ordinary commercial sweets were being falsely marketed as sacred prasad of the Shri Ram Mandir, Ayodhya at a time when the entire nation stood on the eve of the historic Pran Pratishtha ceremony, demanding immediate institutional response without any delay.

6. The Authority was conscious that the Opposite Party's platform, by virtue of its unparalleled reach and the immense trust reposed in it by consumers, occupies a unique position in the Indian digital marketplace. An average consumer transacting on the Opposite Party's platform does not scrutinize the identity of the individual seller but reposes faith in the platform itself. Crores of devotees, unable to physically travel to Ayodhya, sought prasad through online means genuinely believing that listings on a platform of Amazon's stature carried the sanctity and authenticity of prasad authorized by

the Shri Ram Janmabhoomi Teerth Kshetra Trust when in fact they were purchasing nothing more than ordinary commercially manufactured sweets.

7. The Authority was therefore of the considered view that such deliberate exploitation of the religious sentiments of consumers through misleading representations on one of the largest e-commerce platforms in India warranted immediate action. Accordingly, on the very same day of receipt of the representation, the Authority issued a Show Cause Notice dated 19th January 2024 (F.No. CCPA-2/5/2024-CCPA) to Amazon Seller Services Private Limited, calling upon it to furnish its response within seven (7) days. The SCN highlighted violations of Rule 4(3) and Rule 5(3)(a) and (e) of the Consumer Protection (E-Commerce) Rules, 2020 and Sections 2(9) and 2(28) of the Consumer Protection Act, 2019, on the ground that the impugned listings constituted misleading advertisements, violated consumers' right to accurate information, and enabled unfair trade practices by falsely representing ordinary confectionery as sacred prasad associated with the Shri Ram Mandir, Ayodhya.

8. In response to the said notice, vide email dated 27th January 2024, the Opposite Party, Amazon Seller Services Private Limited, through its counsel M/s Saikrishna & Associates, made the following submissions:

- i. Upon receipt of the SCN, the Opposite Party acted expeditiously by taking down all impugned product listings from www.amazon.in under Section 79(3)(b) of the IT Act, and disclosed the identity of the third-party seller for the first time Gaurav Kumar Chandu, M/s Chandu Trading Company, Hanuman Sadan, A.G. Colony Main Road, Patna – 800002, Bihar (Phone: +91-9234398395, Email: chandutradingcompany@gmail.com)
- ii. The Opposite Party operates merely as a marketplace intermediary under Section 2(1)(w) of the IT Act and plays no role in listing, pricing, describing, or selling products the entire process being undertaken solely by third-party sellers

- iii. It claimed safe harbour protection under Section 79(1) of the IT Act and relied upon *Shreya Singhal v. Union of India* [(2015) 5 SCC 1] to contend that 'actual knowledge' under Section 79(3)(b) means knowledge only by court order, and that intermediaries are not obligated to pre-screen content
- iv. All sellers are contractually bound under the *Amazon Business Solutions Agreement ('BSA')* to ensure listing compliance with applicable laws placing the obligation for accurate listings entirely on the third-party seller, seller details were accessible via a hyperlink on the seller's name and consumer grievance redressal was available through its Buyer-Seller Messaging Service, and
- v. By taking down the impugned listings and disclosing the seller's identity, the Opposite Party submitted that it had fully discharged its obligations under applicable law and had not engaged in any unfair trade practice prejudicial to the interests of consumers.

9. The Authority finds the safe harbour defence taken by the Opposite Party to be legally untenable in the present context for the following reasons:

- i. The Consumer Protection (E-Commerce) Rules, 2020 are enacted under the CP Act, 2019 a statute independent of and subsequent to the IT Act. Obligations under Rule 4(3) and Rule 5(3)(a) are platform-level consumer protection duties owed directly to consumers. They are not contingent upon, nor dischargeable by, the intermediary safe harbour under Section 79 of the IT Act. Compliance with one regime does not discharge obligations under the other.
- ii. The safe harbour under Section 79 of the IT Act protects an intermediary from liability for third-party content it does not and cannot immunise a marketplace entity from its own independent statutory obligations of due diligence, seller disclosure, and grievance redressal under the E-Commerce Rules, 2020.

- iii. The reliance placed by the Opposite Party on *Shreya Singhal v. Union of India* [(2015) 5 SCC 1] is misplaced. That judgment was rendered in the context of free speech and expression under Article 19 it was not decided in the context of consumer protection or marketplace obligations under the E-Commerce Rules. The standard of 'actual knowledge' by court order cannot be imported into a consumer protection framework that imposes independent affirmative, proactive, and continuous duties on marketplace entities.
- iv. A marketplace entity that derives commercial benefit from transactions facilitated on its platform as the Opposite Party admittedly did, with Gross Merchandise Sales of INR 25,26,309/- generated through the impugned listings cannot simultaneously claim complete insulation from responsibility by positioning itself as a mere conduit.
- v. The contractual delegation of compliance obligations to sellers through the BSA does not discharge the Opposite Party's statutory obligations under the E-Commerce Rules. Statutory duties cannot be contracted away or delegated to third parties.

10. Being unsatisfied with the response of the Opposite Party, the Authority undertook a preliminary inquiry into the matter. The preliminary inquiry report noted the following specific deficiencies:

- i. While the Opposite Party furnished the contact details of M/s Chandu Trading Company in its reply, none of these details were published on the Amazon platform itself, as required under Rule 5(3)(a) of the E-Commerce Rules, 2020. The Opposite Party's submission that seller details were accessible by clicking a hyperlink was found to be inadequate compliance with this obligation.
- ii. The Buyer-Seller Messaging Service cited by the Opposite Party required mandatory login with an Amazon account. The Authority held that this cannot substitute the statutory obligation under Rule

5(3)(e) to publish grievance officer details in a clear and accessible manner without requiring prior login.

- iii. The Opposite Party had neither furnished a copy of the BSA nor disclosed the consequences of breach thereof. This was necessary to ascertain whether the BSA also cast a duty on the Opposite Party to initiate action against sellers in breach. Merely asserting that the agreement obliges sellers to comply with applicable laws cannot justify misleading listings remaining live on the platform.

11. Having regard to the aforesaid deficiencies and the prima facie case made out in the preliminary inquiry report, the Authority, vide order dated 26th April 2024 (I.D. Note No. CCPA-2/5/2024-CCPA dated 24.04.2024), directed the Director General (Investigation), CCPA to conduct a detailed investigation into the issues highlighted above and to submit its report to the CCPA.

12. Pursuant to the said directions, the Director General (Investigation), CCPA conducted a detailed investigation and submitted the investigation report to the CCPA on 29th October 2024. The key findings of the investigation report are as follows:

- i. In response to the investigation notice dated 23rd July 2024, the Opposite Party vide reply dated 6th August 2024 reiterated its intermediary status and disclosed that M/s Chandu Trading Company was onboarded on the platform on 4th August 2023 and that the Gross Merchandise Sales generated through the impugned listings amounted to INR 25,26,309/-. The Opposite Party also furnished a copy of the BSA, submitting that it obligated sellers to comply with all applicable laws and prohibited deceptive conduct,
- ii. The impugned product listings were found to be prominently marketed under descriptions such as "Sri Ram Mandir Ayodhya Prasad" and "Ayodhya Ram Mandir Ayodhya Prasad", conveying a false impression of authentic prasad associated with Shri Ram Mandir, Ayodhya, despite no material being placed on record to

establish any authorization, affiliation, or authenticity in relation thereto,

- iii. Although the Opposite Party possessed seller information internally, the same was not prominently displayed on the product listing interface as required under Rule 5(3)(a). The mechanism relied upon access through hyperlinks or messaging interfaces requiring mandatory login did not satisfy the requirement of clear and accessible disclosure under Rule 5(3)(e),
- iv. While the BSA contained clauses empowering the Opposite Party to suspend or terminate sellers engaged in deceptive activities, no effective proactive due diligence mechanism was demonstrated to prevent misleading listings from appearing on the platform in the first instance, and
- v. The Opposite Party was found to have failed to ensure adequate compliance with the disclosure obligations under the E-Commerce Rules, 2020 and had not exercised sufficient due diligence in preventing misleading product representations on its platform, thereby enabling the exploitation of consumers' religious sentiments for commercial gain.

13. The Authority further notes that despite the Opposite Party's claim of operating automated monitoring systems and seller compliance mechanisms, the impugned listings which used the name of one of the most revered religious institutions in the country in their very product title remained live on the platform without detection or proactive intervention. This demonstrates that the due diligence mechanisms in place were either non-functional, inadequate, or not applied to listings of a religious nature. An e-commerce platform of the Opposite Party's scale and technological sophistication is expected to deploy monitoring capabilities commensurate with the sensitivity and potential harm of the content being hosted.

14. Upon receipt of the investigation report, the Authority issued a hearing notice dated 24th February 2025 to the Opposite Party, enclosing a copy of the investigation report and fixing the matter for hearing on 12th March 2025.

15. The hearing was held on 12th March 2025. Pursuant thereto, an Interim Order was passed directing the Opposite Party to submit its detailed response by 26th March 2025 and fixing the next hearing on 27th March 2025.

16. In compliance with the aforesaid directions, the Opposite Party, vide email dated 26th March 2025, submitted its detailed response and made the following submissions:

- i. The DG Report fundamentally mischaracterizes ASSPL's status as an intermediary under Section 2(1)(w) of the IT Act - ASSPL neither manufactures, procures, lists, prices, offers for sale, nor directly sells any product on its marketplace, and all listings including the impugned products are created and managed exclusively by third-party sellers,
- ii. ASSPL is entitled to safe harbour protection under Section 79(1) of the IT Act and has fulfilled all conditions thereunder, including prompt removal of the impugned listings upon receipt of the SCN. Reliance was placed upon *Shreya Singhal v. Union of India* [(2015) 5 SCC 1], *Kent RO Systems Ltd. v. Amit Kotak*, *MySpace Inc. v. Super Cassettes Industries Ltd.*, and *Kunal Bahl v. State of Karnataka* to contend that intermediaries are not obligated to pre-screen content and that actual knowledge arises only through court orders or government notifications,
- iii. The DG Report erroneously attributes the actions of M/s Chandu Trading Company to ASSPL, incorrectly treating the Gross Merchandise Sales of INR 25,26,309/- as ASSPL's revenue or profit, when in fact ASSPL receives only a small service fee and the GMS represents the total transaction value between buyers and sellers

- iv. The alleged violation of Rule 6(4)(c) of the E-Commerce Rules, 2020 is inapplicable to ASSPL as it is a provision that expressly governs the duties of sellers and not marketplace operators, any liability thereunder lies squarely with M/s Chandu Trading Company,
- v. All sellers are contractually bound under the Amazon Business Solutions Agreement to ensure listing compliance with all applicable laws, the BSA places the obligation for accurate and lawful listings entirely on third-party sellers, and ASSPL's contractual safeguards constitute adequate due diligence in accordance with Section 79(2)(c) of the IT Act, and
- vi. ASSPL has implemented reasonable due diligence mechanisms including multi-tiered seller verification, automated monitoring systems, machine learning algorithms to identify prohibited listings, and a structured takedown and enforcement mechanism, and respectfully submitted that the DG Report's conclusions are legally untenable and warrant reconsideration.

17. The matter was heard on 27th March 2025 wherein Shri Nitin Sharma, Shri Vivek Ayyagari, Ms. Parushi Sridhar and Ms. Chanda S appeared on behalf of the Opposite Party. During the course of the hearing, the Authority sought specific factual clarifications from the Opposite Party on the following aspects:

- i. GST particulars of the Impugned Seller, M/s Chandu Trading Company,
- ii. Portion of revenue received by the Opposite Party in respect of the sale of the impugned products by M/s Chandu Trading Company and
- iii. Logistical understanding of the delivery of the impugned products sold by M/s Chandu Trading Company to end-customers.

18. In response to the aforesaid queries, the Opposite Party vide email dated 1st May 2025, submitted additional factual clarifications, the salient points whereof are as follows:

- i. The GST Registration number of M/s Chandu Trading Company, as per the Opposite Party's records, is 10AMBPC9847N2ZX,
- ii. The total revenue generated from the sales of the four impugned product listings identified in the SCN was INR 39,802.29/-, of which the Opposite Party received INR 15,165.90/- as its service fee for providing the marketplace infrastructure. It was further clarified that the Gross Merchandise Sales figure of INR 25,26,309/- previously furnished represented the Impugned Seller's total GMS across all product listings and did not constitute the Opposite Party's revenue or profit and
- iii. The impugned products were delivered to end-customers through the Opposite Party's 'Easy Ship' mechanism, under which the product inventory remains solely with the third-party seller, products are pre-packed by the seller before collection, and the Opposite Party merely provides transportation services akin to a courier company without involvement in any aspect of product packaging. The responsibility for ensuring product compliance with applicable laws and appropriate packaging rests entirely with the seller.

19. Also, upon receipt of the DG Investigation Report, the Authority upon perusal of the findings therein, observed that M/s Chandu Trading Company, being the seller responsible for uploading the impugned listings under product descriptions such as "Sri Ram Mandir Ayodhya Prasad" and "Ayodhya Ram Mandir Prasad", was also liable for action under the Consumer Protection Act, 2019 for misleading consumers regarding the origin, authenticity, affiliation, and religious sanctity of the products offered for sale. Accordingly, a Show Cause Notice dated 28th April 2025 was issued to M/s Chandu Trading Company calling upon it to show cause why action should not be initiated against it under the applicable provisions of the Act.

20. Subsequently, reminders dated 17th June 2025, 8th August 2025 and 20th November 2025 were issued to M/s Chandu Trading Company, however, no response or submission was received from the said entity. The Authority

accordingly resolved to proceed with the final hearing against the Opposite Party, while the matter against M/s Chandu Trading Company shall be proceeded against separately in accordance with law.

21. An opportunity of hearing was granted to the Opposite Party on 10th March 2026. During the hearing, Shri Manas Raghuvanshi, Ms. Mythili Girish, Ms. Meghana Singh and Shri Vivek Ayyagari appeared on behalf of the Opposite Party. The Opposite Party, inter alia, submitted that it had never intended to be complicit with M/s Chandu Trading Company, that it was not involved in the packaging of the products listed on its marketplace and that the platform maintained due diligence systems in relation to seller onboarding and product listings.

22. During the hearing, the Authority raised specific queries regarding proactive measures undertaken by the Opposite Party to prevent misleading listings capable of exploiting the religious sentiments of consumers. In response, the Opposite Party submitted that the relevant data was not readily available and undertook to furnish the same within a reasonable time.

23. Accordingly, the Authority vide Interim Order dated 12th March 2026 directed the Opposite Party to furnish:

- i. details of due diligence mechanisms and proactive measures adopted to identify, monitor and delist misleading listings, particularly during festivals and religious occasions, and
- ii. specific and verifiable data concerning listings relating to religious items or 'prasad' on the platform, particularly those listed after issuance of the SCN.

24. Pursuant thereto, the Opposite Party vide response dated 31st March 2026 submitted detailed written submissions reiterating, inter alia, its intermediary status, reliance on safe harbour protection under Section 79 of the IT Act, absence of any legal obligation to proactively monitor all listings,

and adequacy of its KYC verification, GST verification, contractual safeguards, automated monitoring systems, and enforcement measures. It further stated that additional safeguards had been implemented following the SCN to identify and prohibit listings relating to the impugned products.

25. Thereafter, a hearing was held on 4th May 2026. The Opposite Party submitted that it had implemented mechanisms to identify, flag and prohibit listings pertaining to "Shri Ram Mandir Ayodhya Prasad" following receipt of the SCN. The Authority expressed concern that consumers searching for the term "prasad" on the platform may continue to encounter misleading listings falsely marketed as prasad associated with prominent religious shrines such as Tirupati Devasthanam and Vaishno Devi.

26. In response, the Opposite Party submitted that a blanket prohibition on such listings may not be appropriate and sought two weeks' time to propose specific due diligence measures. Accordingly, vide Interim Order dated 11th May 2026, the Authority directed the Opposite Party to submit within two weeks a concrete proposal outlining the due diligence measures proposed to be implemented in relation to listings falsely claiming to offer 'prasad' associated with prominent religious institutions and shrines.

27. Pursuant to the said directions, the Opposite Party through its counsel submitted a detailed response dated 28th May 2026 proposing a due diligence framework, the salient features of which are as follows:

- i. A reasonable and proportionate mechanism to identify and take down misleading listings falsely claiming to be 'prasad' associated with prominent religious shrines and institutions,
- ii. The framework would apply to listings using terms such as 'prasad', 'prasadam', 'mahaprasad' or 'bhog' which expressly or impliedly claim official affiliation, authorization, endorsement, certification, or sourcing from identified religious institutions/shrines,

- iii. Sellers furnishing documentary proof regarding authenticity and procurement from authorized sources would be permitted to continue such listings,
- iv. Listings attempting to circumvent the safeguards through alternate terminology or categorization would be promptly taken down, and
- v. The framework presently covers ten major religious institutions and shrines including Shri Ram Janmabhoomi Mandir, Tirumala Tirupati Devasthanam, Shri Mata Vaishno Devi Shrine, Shri Kashi Vishwanath Temple, Shri Jagannath Temple, Shri Kedarnath Temple, Shri Badrinath Temple, Shri Somnath Temple, Shri Dwarkadhish Temple and Shri Mahakaleshwar Temple.

28. The final hearing in the matter was held on 29th May 2026. During the hearing Shri Vivek Ayyagari, Shri Saikrishna Rajagopal, Ms. Mythili Girish, Ms. Meghana Singh and Shri Manas Raghuvanshi appeared on behalf of the Opposite Party. The Opposite Party submitted that it would commence steps towards implementation of the proposed structured safeguards and monitoring mechanisms for identifying, flagging and restricting misleading listings falsely representing products as 'prasad', 'prasadam', 'mahaprasad', 'bhog' or other similar religious offerings purportedly associated with prominent temples, shrines and religious institutions across the country.

29. The Authority took serious note of the larger consumer protection concerns arising from misleading online representations involving products falsely projected as sacred religious offerings connected with revered shrines and places of worship. Such misleading listings are capable not only of deceiving consumers regarding the origin, authenticity and sanctity of the products, but also of exploiting the deeply held religious sentiments and faith of consumers across the country. Large e-commerce marketplace entities occupy a position of immense influence and responsibility in the digital marketplace ecosystem and are therefore expected to maintain robust due diligence standards and proactive institutional safeguards.

30. The Authority observes that the Consumer Protection (E-Commerce) Rules, 2020 and the IT Act operate on distinct legal planes and are not mutually exclusive. A marketplace entity cannot selectively invoke its intermediary status under the IT Act to escape consumer protection obligations while simultaneously deriving commercial benefits from the transactions on its platform. The E-Commerce Rules mandate affirmative, proactive, and continuous obligations on marketplace entities not merely reactive ones triggered by court orders or specific complaints. In particular:

- i. Rule 4(3) casts an absolute and standing prohibition on unfair trade practices on the E-Commerce platforms, irrespective of whether the Opposite Party had prior knowledge of a specific violation which by its virtue amounts to Unfair Trade Practice.
- ii. Rule 5(3)(a) mandates a continuous and subsisting obligation to prominently display seller details on the platform at all times,
- iii. The safe harbour under Section 79 of the IT Act is a defence against liability arising from third-party content, it is not a licence to abdicate the Opposite Party's own independent statutory consumer protection duties cast upon it directly by the E-Commerce Rules, 2020.

31. The Authority observes that the phrase "Shri Ram Mandir Ayodhya Prasad" carries a specific and well-understood meaning for Hindu devotees where it denotes sacred food offered to and blessed by the deity at the Ram Mandir, Ayodhya. The commercial appropriation of this phrase for ordinary confectionery products, without any authorization from the Shri Ram Janmabhoomi Teerth Kshetra Trust, constitutes not just a misleading trade practice under the CP Act but an affront to the religious sentiments of crores of consumers. The Opposite Party's platform, by reason of its scale and reach, lent an inherent imprimatur of legitimacy to such listings in the eyes of an average consumer amplifying the harm caused manifold.

32. The Authority notes with particular concern the timing of the impugned listings. The products falsely claiming to be 'Shri Ram Mandir Ayodhya Prasad' were listed on the Opposite Party's platform prior to the Pran Pratishtha (consecration) ceremony of the Shri Ram Mandir, Ayodhya, which took place on 22nd January 2024 one of the most significant and widely anticipated religious events in contemporary Indian history. The SCN was issued by this Authority on 19th January 2024, just three days before the consecration ceremony, at the very height of religious fervour and consumer vulnerability. The Opposite Party, equipped with automated monitoring systems and dedicated seller compliance infrastructure, cannot credibly contend that it was unaware of the heightened sensitivity surrounding any product carrying the name of the Shri Ram Mandir during this period.

33. The Authority further observes that the Opposite Party's initial response was to take down the listings only after receipt of the SCN, and to fall back entirely upon its intermediary defence, without acknowledging any proactive obligation to prevent such listings in the first instance. It was only through the sustained engagement of this Authority spanning multiple hearings, interim orders, and directions over a period of more than two years that the Opposite Party was moved to propose a structured due diligence framework. This underscores the critical necessity of robust regulatory oversight of e-commerce marketplace entities in matters touching upon consumer rights and public sentiment.

34. The Authority, while noting the cooperative approach adopted by the Opposite Party during the later stages of proceedings and its willingness to implement a structured compliance framework, is constrained to observe that such cooperation cannot entirely efface the gravity of the conduct that gave rise to the present proceedings. The Opposite Party is one of the largest e-commerce marketplaces operating in India, with an extensive user base spanning hundreds of millions of consumers. The scale and reach of the platform is precisely what amplifies the harm a deceptive listing on this

platform carries an inherent legitimacy in the eyes of an average consumer by virtue of the platform's size, visibility, and market dominance.

35. The CCPA is empowered under Section 21(1) of the CP Act, 2019 to issue directions to the concerned trader, manufacturer, endorser, advertiser, or publisher to discontinue or modify a false or misleading advertisement. Under Section 21(4), where the Central Authority is satisfied after investigation that any person is found to publish, or is a party to the publication of, a misleading advertisement, it may impose on such person a penalty which may extend to Rs. 10,00,000/-. The Opposite Party, by hosting, displaying, and facilitating the sale of the impugned listings on its platform, was unquestionably a party to the publication of misleading advertisements within the meaning of Section 21(4) of the CP Act, 2019.

36. In determining the quantum of penalty, the Authority has had regard to the factors prescribed under Section 21(7) of the CP Act, 2019, as follows:

- i. The impugned listings were available for nationwide delivery on one of India's largest e-commerce platforms, accessible to hundreds of millions of consumers across the country,
- ii. The impugned listings were live on the platform prior to and at the time of issuance of the SCN on 19th January 2024, during the peak period of public anticipation surrounding the Pran Pratishtha ceremony on 22nd January 2024, and were taken down only after receipt of the SCN,
- iii. Devout Hindu consumers seeking to participate in or commemorate the historic consecration of the Shri Ram Mandir, Ayodhya were especially susceptible to being misled by listings falsely claiming to offer authentic prasad from the temple, constituting a particularly vulnerable class of consumers whose religious faith and emotions were exploited, and
- iv. The Gross Merchandise Sales generated by M/s Chandu Trading Company through the impugned listings on the Opposite Party's

platform amounted to INR 25,26,309/-, from which the Opposite Party also derived commission/fee income through its normal marketplace operations.

37. Having regard to the above factors, and taking into account the cooperative conduct and voluntary compliance framework proposed by the Opposite Party during the later stages of proceedings which the Authority recognizes as a mitigating factor and the fact that this is a first contravention by the Opposite Party in proceedings before this Authority in relation to such matters, the Authority is of the considered view that a penalty at the lower end of the prescribed range is appropriate in the present case, while clearly signalling that any future recurrence will invite significantly more stringent action.

38. In light of the detailed facts, findings, and observations above, the CCPA issues the following directions under Section 20 and Section 21 of the Consumer Protection Act, 2019:

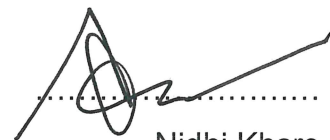
- i. The opposite party shall ensure that no product falsely claiming to be 'prasad', 'prasadam', 'mahaprasad', 'bhog' or any similar religious offering associated with the religious institutions and shrines named in Para 27 (v) of this order, is listed, hosted, advertised, exhibited, or offered for sale on its platform without verifiable documentary proof of authorization from the concerned institution.
- ii. The opposite party shall prominently display complete seller details including the name, address, customer care number, and grievance officer information on its platform in compliance with Rule 5(3)(a) and Rule 5(3)(e) of the E-Commerce Rules, 2020.
- iii. The opposite party shall implement and strengthen the due diligence framework proposed vide its communication dated 28th May 2026, including keyword-based identification and takedown

mechanisms, and shall periodically review and expand its coverage to include additional religious institutions and shrines.

- iv. The CCPA hereby imposes a **penalty of ₹ 1,00,000/- (Rupees One Lakh only)** on the opposite party for publication of misleading advertisements on its platform, in violation of Rule 4(3) and Rule 5(3)(a) of the E-Commerce Rules, 2020 read with Section 2(28) and Section 2(9) of the CP Act, 2019.

39. The Opposite Party shall deposit the penalty amount to the CCPA within 15 days from the date of this Order.

40. The present proceedings stand disposed of with the above directions. The assurances and proposals furnished by the Opposite Party shall remain subject to continuous oversight and review by the Authority. Any future recurrence of similar misleading listings or failure to effectively implement the compliance mechanisms proposed before this Authority shall invite stringent action under the provisions of the CP Act, 2019, including imposition of penalties at the higher range prescribed under Section 21. The Authority reserves liberty to review compliance and the effectiveness of the proposed framework after a period of three to four months.



Nidhi Khare

Chief Commissioner



Anupam Mishra

Commissioner