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ARTICLE

REGULATORY INNOVATION THROUGH AUTHORITY: AN ANALYSIS OF INDIA'S CENTRAL CONSUMER PROTECTION AUTHORITY'S FUNCTIONING (2020–2025)*

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ABSTRACT

This article presents the first comprehensive empirical analysis of India's Central Consumer Protection Authority (CCPA), since its establishment in 2020, based on an examination of 165 orders across 118 cases through 2025. The study fills a critical research gap by systematically analysing CCPA's enforcement patterns, procedural efficiency, and regulatory evolution. The unique dataset reveals that CCPA has fundamentally transformed India's consumer protection landscape through a distinctive dual approach that combines reactive enforcement with proactive regulation. This study finds that 72 per cent of cases were initiated suo moto, indicating a paradigm shift from complaint-driven to preventive market surveillance and that enforcement activities are concentrated in sectors with high information asymmetries: coaching centres (96 per cent violation rate), health and hygiene products (84 per cent violation rate), and e-commerce platforms (100 per cent violation rate). A temporal analysis done as part of the study reveals significant institutional learning, with the average case duration reducing from 437.12 days in 2022 to 322.79 days in 2024. The study identifies a sophisticated interdependence between enforcement actions and regulatory guidelines, with CCPA progressing from general misleading advertisement standards (2022) to targeted frameworks for dark patterns (2023), greenwashing (2024), sector-specific coaching regulations (2024), and the regulation of walkie talkie sales in e-commerce (2025). This iterative approach demonstrates that adaptive regulation responds well to emerging consumer challenges. However, some challenges in relation to penalty collection and institutional transparency persist. The article concludes that CCPA represents an institutional innovation that effectively combines investigative, enforcement, and rule-making functions to protect collective consumer interests. While improvements in penalty enforcement and transparency are needed, CCPA's adaptive, evidence-based approach positions it well to address evolving digital market challenges and sophisticated trading practices.

I. INTRODUCTION

Consumer protection in India has historically relied on adjudicatory mechanisms such as consumer commissions to address individual grievances.[1] These bodies—designed to operate at district, state, and national levels—function within a complaint-driven model that focuses on resolving disputes after harm has occurred.[2] While the Consumer Protection Act 1986 was groundbreaking in that it established this framework, the limitations of the legislation gradually began to reveal themselves while the state attempted to address evolving market dynamics—particularly the rise of e-commerce, digital services, and sophisticated marketing practices.[3] The system remained largely reactive, requiring individual consumers to navigate complex procedures—a practice that is especially concerning in contexts marked by information asymmetries.[4] The enactment of the Consumer Protection Act 2019 and the subsequent establishment of the Central Consumer Protection Authority (CCPA) thus introduced a significant institutional innovation.[5]

Unlike the earlier regime, the CCPA embodies a regulatory approach that complements the existing adjudicatory mechanisms by focusing on

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[1] Anupama Ghosal, 'Consumer Protection in India: Past and Present' [2010] 14 Jadavpur Journal of International Relations 237 <https://doi.org/10.1177/0973598410110018>.
[2] Consumer Protection Act 2019, s 34.
[3] Neelam Chawla and Basanta Kumar, 'E-Commerce and Consumer Protection in India: The Emerging Trend' [2022] 180 Journal of Business Ethics 581 <https://doi.org/10.1007/s10551-021-04884-3>.
[4] Ankur Saha and Sri Khanna, 'Evolution of Consumer Courts in India: The Consumers Protection Act 2019 and Emerging Themes of Consumer Jurisprudence' [2022] 9 International Journal on Consumer Law and Practice 115.
[5] Ministry of Consumer Affairs, Food and Public Distribution, 'CCPA Gazette Notification' (*EGazette*, 23 July 2020) <https://egazette.gov.in/WriteReadData/2020/220783.pdf> accessed 24 May 2025.

collective consumer interests and systemic market failures.[6] Its mandate, under Sections 10 and 18 of the Act, empowers it to protect and enforce the rights of 'consumers as a class' through investigation, injunctive orders, penalties, and advisory functions, which are powers that were largely absent in the earlier framework.[7] This shift aligns with global trends in consumer protection governance, where specialized regulatory bodies increasingly play a central role in preventive regulation and market-wide enforcement.[8]

Within this ecosystem, the CCPA occupies a distinct position. While consumer commissions continue to perform quasi-judicial functions, in that they adjudicate individual disputes based on pecuniary jurisdiction,[9] the CCPA functions as a regulatory authority with a broader mandate: to 'protect, promote, and enforce the rights of consumers as a class'.[10] This distinction enables the authority to intervene preventively, address unfair trade practices[11] and misleading advertisements,[12] and regulate market behaviour beyond individual transactions. Its jurisdiction spans violations of consumer rights, unfair trade practices, and misleading advertisements across both physical and digital marketplaces. Anyone

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[6] Central Consumer Protection Authority, 'CCPA Annual-Report-2022-23' (*Department of Consumer Affairs*, 2025) <https://doca.gov.in/ccpa/annual-report/CCPA-Annual-Report-2022-23.pdf> accessed 24 May 2025.
[7] PRS Legislative Research, 'Legislative Brief - Consumer Protection Bill, 2018' (*PRS India*, 27 April 2018) <https://prsindia.org/files/bills_acts/bills_parliament/2019/Legislative%20Brief%20-%20Consumer%20Protection%20Bill,%202018_0.pdf> accessed 22 May 2025.
[8] Jacint Jordana, David Levi-Faur, and Xavier Fernández I Marín, 'The Global Diffusion of Regulatory Agencies: Channels of Transfer and Stages of Diffusion' [2011] 44 Comparative Political Studies 1343 <https://doi.org/10.1177/0010414011407466>.
[9] Consumer Protection Act 2019, s 34, 47, and 58.
[10] Consumer Protection Act 2019, s 18.
[11] Consumer Protection Act 2019, s 2(47).
[12] Consumer Protection Act 2019, s 2(28).

can submit a complaint to the CCPA by simply writing a letter or an email to it. The only condition is that such complaints must pertain to the 'violation of consumer rights or unfair trade practices or false or misleading advertisements which are prejudicial to the interests of consumers as a class'.[13] However, in at least one case, the CCPA refused to take cognizance of a complaint as it had been submitted by a competitor.[14] Unlike the complaints before consumer commissions, which are empowered to award relief to individuals, the CCPA's orders are mostly in the nature of penalties for violations; the idea is not to compensate individuals but to hold manufacturers and sellers responsible. Accordingly, it has not been observed that consumers can and do approach a consumer commission and the CCPA simultaneously. In addition, the CCPA also has the power to take up cases *suo moto* or on the directions of the central government.[15]

A defining feature of the CCPA's institutional design is its dual regulatory approach. On the one hand, it exercises reactive enforcement powers under Sections 20 and 21, including ordering the recall of goods, withdrawal of services, discontinuation of unfair practices, reimbursement, and penalties. On the other hand, it performs a proactive regulatory role through guidelines and advisories issued under Section 18, shaping industry standards and preventing violations before they occur.[16] This combination of enforcement and rulemaking allows

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[13] Consumer Protection Act 2019, s 17.
[14] Indrajeet's Iquanta EDU Services Pvt. Ltd., Case Number: J-25/30/2022-CCPA.
[15] Consumer Protection Act 2019, s 18(2)(a).
[16] Central Consumer Protection Authority, 'Guidelines for the Prevention and Regulation of Illegal Listing and Sale of Radio Equipment Including Walkie Talkies on E-Commerce Platforms, 2025' (*Department of Consumer Affairs*, 27 May 2025) <https://doca.gov.in/ccpa/files/Guidelines%20for%20the%20Prevention%20and%20Regulation%20of%20Illegal%20Listing%20and%20Sale%20of%20Radio%20Eq

the authority to address systemic issues that traditional complaint-based mechanisms could not tackle effectively.

Existing scholarship has primarily examined the CCPA's institutional design and theoretical potential.[17] However, there is a lack of empirical

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uipment%20including%20Walkie%20Talkies%20on%20ECommerce%20Platforms,%202025.pdf> accessed 10 January 2026; Central Consumer Protection Authority, 'Guidelines to Prevent Unfair Trade Practices and Protection of Consumer Interest with Regard to Levy of Service Charge in Hotels and Restaurants' (*Department of Consumer Affairs*, 4 July 2022) <https://doca.gov.in/ccpa/files/guidelines-to-prevent.pdf> accessed 10 January 2026; Central Consumer Protection Authority, 'The Guidelines for Prevention and Regulation of Dark Patterns, 2023' (*Department of Consumer Affairs*, 30 November 2023) <https://consumeraffairs.nic.in/sites/default/files/The%20Guidelines%20for%20Prevention%20and%20Regulation%20of%20Dark%20Patterns%2C%202023.pdf> accessed 24 May 2025; Central Consumer Protection Authority, 'Guidelines for Prevention of Misleading Advertisement in Coaching Sector, 2024' (*Department of Consumer Affairs*, 13 November 2024) <https://doca.gov.in/ccpa/files/Guidelines%20for%20Prevention%20of%20Misleading%20Advertisement%20in%20Coaching%20Sector,%202024.pdf> accessed 16 May 2025; Central Consumer Protection Authority, 'Guidelines for Prevention and Regulation of Greenwashing or Misleading Environmental Claims, 2024' (*Department of Consumer Affairs*, 15 October 2024) <https://doca.gov.in/ccpa/files/Greenwashing_Guidelines.pdf> accessed 16 May 2025; Ministry of Consumer Affairs, Food & Public Distribution, 'Central Consumer Protection Authority Issues "Guidelines for Prevention and Regulation of Dark Patterns, 2023" for Prevention and Regulation of Dark Patterns Listing 13 Specified Dark Patterns' (*Press Information Bureau*, 8 December 2023) <https://www.pib.gov.in/www.pib.gov.in/Pressreleaseshare.aspx?PRID=1983994> accessed 16 May 2025.

[17] Vagish K Singh and Ashish K Singh, 'Central Consumer Protection Authority – A Critical Analysis' [2020] 8 International Journal on Consumer Law and Practice 59; Dinesh Kumar Mishra and Soaham Bajpai, 'Influencer Marketing, Hidden Endorsements, and Consumer Deception: An Analysis of India's Consumer Protection Framework' [2026] 2 Advances in Consumer Research 2923 <https://doi.org/10.5281/zenodo.18467950>; P Umesh, 'India: The Consumer Protection Act 2019 – Exposures & Liability Insurance Protection' [2019] 19 Bimaquest <https://bimaquest.niapune.org.in/index.php/bimaquest/article/view/52> accessed 28 April 2026; Tamal Gupta, Prodipta Barman and Joydeb Patra, 'Changing Dimension of Consumocratic Jurisprudence Towards Escalating the Consumerism in The Globalized India: An Analytical Discourse' [2025] 2 Advances in Consumer Research 99 <https://acr-journal.com/article/changing-dimension-of-consumocratic-jurisprudence-towards-escalating-the-consumerism-in-the-globalized-india-an-analytical-discourse-921> accessed 20 July 2026.

analysis that could help readers understand how the authority has operationalized its mandate in practice. This article addresses that gap through the identification and use of a systematic dataset,[18] analysing enforcement patterns, sectoral focus, procedural dynamics, and regulatory outcomes.

The findings of this paper indicate that CCPA has predominantly relied on *suo moto* investigations (72 per cent of cases), concentrated enforcement in sectors such as e-commerce, health products and cosmetics, and coaching centres, and focused heavily on misleading advertisements and safety-related violations. These patterns highlight the authority's emerging role as an active market regulator rather than a passive dispute-resolution body.

By situating the CCPA within India's broader consumer protection ecosystem and analysing the authority's functioning empirically, this article contributes to an understanding of how regulatory innovation is reshaping consumer governance in India. It demonstrates that the evolution from a reactive, complaint-driven model to a proactive, market-wide regulatory framework represents a fundamental transformation in the country's approach to consumer protection.

The paper proceeds as follows. Section II outlines our methodology and data analysis framework. The section after that presents the study's empirical findings on CCPA's enforcement patterns across sectors and over time. Section IV details the guidelines and advisories issued by the

[18] Gaurav Pathak, Mohit Yadav and Anush Ganesh, 'CCPA Dataset' <https://doi.org/10.17632/86bttwrpt2.1> accessed 18 June 2026.

CCPA, and how their formation is directly related to enforcement. The paper concludes with Section V.

II. METHODOLOGY AND DATA ANALYSIS FRAMEWORK

The methodological approach employed in this paper combines quantitative analysis of enforcement patterns with a qualitative assessment of regulatory actions. This section outlines the data collection process, coding methodology, analytical framework, and methodological limitations.

We developed a unique dataset by systematically collecting all 165 orders published on CCPA's official website—from its inception up to 31 December 2025.[19] The data collection process involved three stages. First, all orders available from the CCPA website were scraped with the help of the DownThemAll extension on a Mozilla Firefox web browser. The extension enabled the downloading of multiple orders at the same time and reduced manual intervention. Thereafter, we standardized the file names and then performed an Optical Character Recognition (OCR) on all orders to make it easier to work with them. The use of OCR transformed scanned orders into machine-readable, editable, and searchable text.

To ensure analytical consistency, each of the 165 orders was systematically coded according to a self-created standardized framework and laid out in a table. The coding framework was developed iteratively, beginning with preliminary variables identified from the legal framework of the Consumer Protection Act 2019. The data in the table was then

[19] Central Consumer Protection Authority, 'Orders' (*Department of Consumer Affairs*) <https://ccpa.doca.gov.in/ccpa-orders> accessed 21 July 2026.

condensed to focus on 118 cases, as multiple orders were sometimes part of the same case and in some instances, different cases had the same case number. The final coding scheme included the following primary variables:

1. **Case Identification:** Case number, date of complaint, date of show cause notice, date of final order, respondent details.

2. **Case Types:** Categorized as *suo moto* investigations or complaint-based proceedings, with sub-classification of complaint sources (individual consumers, consumer organizations, government referrals).

3. **Investigation:** Whether a preliminary enquiry was conducted, date of referral to the director general for investigation, and date of investigation report submitted by director general.

4. **Sectoral Classification:** Primary business sector of the respondent, keeping in context the nature of the case.

5. **Misleading Advertisement:** Categorized to check whether the respondent was found guilty of using a misleading advertisement.

6. **Outcomes:** Findings (violation/no violation), specific orders issued, penalty amounts, remedial measures, and compliance requirements.

Our analytical framework focused on five key dimensions of CCPA's enforcement activity:

1. **Sectoral Patterns:** We captured detailed sectoral classifications to identify CCPA's enforcement priorities across market segments. Instead of having a broad category such as 'Education', we developed specific categories relevant to consumer protection regulation. This included,

among other things, distinguishing between different types of educational services (coaching centres, higher education, etc.) and digital services (e-commerce, food delivery, digital payments, etc.).

2. Procedural Analysis: We documented comprehensive procedural timelines to analyse CCPA's operational efficiency. Variables included the time from initiation to final order, and variations across sectors and violation types. This procedural mapping enables an assessment of CCPA's investigative efficiency and institutional evolution over time.

3. Violation Patterns: Our coding framework captured detailed violation typologies (misleading advertisements, unfair trade practice, etc.) across the three statutory domains that fall within the CCPA jurisdiction—namely, the violation of consumer rights, unfair trade practices and false or misleading advertisements that are prejudicial to the interests of public and consumers, and the promotion, protection and enforcement of the rights of consumers as a class.[20]

4. Remedial Measures: The full spectrum of remedial orders issued by CCPA, including recall orders, discontinuation directives, corrective advertising requirements, reimbursement provisions, and penalty impositions, were documented.

That said, before examining the method and analytical framework, it must be clarified that several methodological challenges warrant acknowledgment. First, the dataset was limited to publicly available orders, as it excluded those orders that were not uploaded online by the

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[20] Consumer Protection Act 2019, s 10(1).

CCPA.[21] In addition, the time frame for this study was limited to 31 December 2025.

We also filed two applications under the Right to Information Act 2005. The first right to information (RTI) application sought further information about annual reports that the CCPA is required to publish[22] but had not done so and about an order which was not put up online. The RTI was wrongly disposed of, with the CCPA stating the reports were in the process of being uploaded online (with no specific timeline for the uploading mentioned) and that the order already exists on the website.[23] However, once the appeal against this disposal was filed, the CCPA uploaded the annual reports, and the order that was sought in the RTI application on its website. Through the second RTI application, details about many cases, such as about their initiation and current status, were sought, in addition to copies of several orders. However, this RTI was disposed of[24] by relying on an exemption provision, which is for not providing information that might 'impede the process of

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[21] Details of some of such orders are present in the CCPA annual reports for 2022–23 and 2023–24, such as those that have to do with Ola, Uber, Safal Hospitality, Mango Holidays, Asus India, Ixigo, Kesari Tours, Happy EasyGo, and Thomas Cook. These cases mainly pertain to refund issues during COVID-19 pandemic or misleading advertisements.

[22] The Consumer Protection Act 2019, s 27 and the CCPA (Annual Report) Rules of 2021 mandated that the CCPA prepare and furnish a report to the central government. The CCPA in the reply vide letter, number CCPA-9/30/2025-CCPA dated 20 March 2025, to an RTI application dated 20 February 2025 said that the reports would be published on the website.

[23] Central Consumer Protection Authority, 'Reply to First RTI Application' (Stored on Google Docs, 20 March 2025) <https://drive.google.com/file/d/1wpojM-V1qkJ3Y7t3FcFZUmyEIdSnlC-a/view?usp=drive_open&usp=embed_facebook> accessed 23 May 2025.

[24] Central Consumer Protection Authority, 'Reply to Second RTI Application' (Stored on Google Docs, 2 May 2025) <https://drive.google.com/file/d/1w71ZyWaz2hIvf3qTZpYO3774QyzQVdp0/view?usp=drive_open&usp=embed_facebook> accessed 23 May 2025.

investigation'.[25] Considering the stonewalling of the RTI applications and the appeal,[26] we decided to not approach the next appellate authority—i.e., the Central Information Commission—at this stage.

Second, the relatively short operational history of CCPA limits the identification of long-term regulatory trends. Additionally, assessing regulatory effectiveness poses inherent challenges. While we can document compliance with specific orders, broader market impacts such as deterrent effects or changes in industry practices are more difficult to measure directly.

Lastly, although the CCPA started its operations in 2020, at the time of writing this paper, the authority had only published its annual reports for 2022-23, 2023-24, and 2024-25. This limited the study to some extent.

Despite these limitations, the methodology employed provides the most comprehensive empirical assessment of CCPA's functioning to date. The exhaustive nature of our dataset,[27] combined with the systematic coding approach used, enables robust identification of enforcement patterns that illuminate CCPA's evolving role within India's consumer protection ecosystem.

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[25] Right to Information Act 2005, s 8(h).
[26] Central Consumer Protection Authority, 'Order on First Appeal' (Stored on Google Docs, 22 April 2025) <https://drive.google.com/file/d/169OiRdECV3Dm1oUzKz6P1lfTwIUC8SM0/view?usp=sharing> accessed 24 May 2025.
[27] Pathak, Yadav, and Ganesh (n 18).

III. EMPIRICAL FINDINGS: ENFORCEMENT PATTERNS

This section presents the empirical findings derived from the analysis of the dataset. It examines the distribution of cases across sectors, patterns of violations, procedural efficiency, and the nature of remedies imposed. The findings reveal both the authority's enforcement priorities and the varying levels of regulatory compliance across industries, with particularly strong scrutiny directed towards coaching centres, health products, cosmetics, and e-commerce platforms.

A. Distribution of Cases Across Sectors

The CCPA's enforcement activities span multiple sectors, with there being a clear concentration in a few key areas. Coaching centres represent the largest segment with 30 cases filed (25 per cent of the total), reflecting heightened regulatory scrutiny of educational service providers.[28] Health products and cosmetics follow with 25 cases, indicating a substantial focus on products related to public health.[29] E-commerce platforms constitute the third-largest group with 21 cases, demonstrating CCPA's attention to digital marketplaces. The remaining cases are distributed across diverse sectors. Several sectors have minimal representation with only one or two cases each.

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[28] Central Consumer Protection Authority, 'CCPA Annual Report 2024–25' (*Department of Consumer Affairs*, 2025) <https://doca.gov.in/ccpa/annual-report/Annual%20Report%20English-1-2024-25.pdf> accessed 29 April 2026.
[29] ibid.

Table 1: Sector-wise distribution of cases

Sector	Total Cases
Coaching Centre	30
Health Products and Cosmetics	25
E-Commerce	21
Food & Beverages	6
Travel	6
Walkie Talkie	5
Healthcare Establishments	4
Consumer Appliances	4
Pressure Cooker	4
Batteries	3
Restaurants	2
Food Delivery	2
Toys	2
Higher Education	1
Fire Safety	1
Digital Payments	1
Furniture	1
Total	118

Source: CCPA Dataset

(i) Sector-Specific Violation Patterns

An analysis of the violation patterns reveals distinct trends across different sectors. In the coaching centre sector, violations predominantly involve misleading advertisements about success rates,[30] faculty qualifications, and guaranteed job placements. Health products and cosmetics cases frequently centre on unsubstantiated product claims; this trend was particularly notable during the COVID-19 pandemic when companies made unverified assertions about virus protection.[31] The e-commerce sector exhibits violations related to false discounts and misleading product descriptions.[32] Pressure cooker cases uniformly involve non-compliance with mandatory BIS certification standards.[33] Travel sector violations, while fewer in number, attract the most refunds and typically involve unfair cancellation policies.[34] Food and beverage violations generally concern misleading nutritional claims or unsubstantiated health benefits.[35] Consumer electronics and appliances predominantly face violations for misleading advertising about product features and functionality.[36] Healthcare establishment violations focus on misleading treatment claims and package pricing.[37] Across these

[30] In the Vision IAS case regarding misleading advertisements, Case No: CCPA-2/24/2022-CCPA, the CCPA found that the advertisements were false and misleading as they deliberately concealed important information with respect to the specific course opted by the successful candidates from the institute and that for the purpose of promoting the sale and use of its service, the institute had adopted unfair and deceptive practices, thereby giving a misleading impression about the efficiency of its services.

[31] In relation to Hindustan Unilever Ltd (HUL), Case No: CCPA/3/2022-CCPA, the CCPA had initiated action against HUL based on a consumer complaint regarding misleading claims that the 'Lifebuoy Immunity Boosting Hand Sanitizer' provided immunity and protection against COVID-19. The Drugs Controller General of India (DCGI) confirmed that the claim was not validated by any authority. HUL removed the advertisement and stopped manufacturing the product, leading to case closure.

[32] Digital Age Retail Pvt. Ltd (Firstcry), Case Number: CCPA/26/2023-CCPA.

[33] Sohil Impex, Case Number: J-25/72/2021-CCPA (Part 9).

[34] Cleartrip Pvt. Ltd, Case Number: J-25/25/2021-CCPA.

[35] United Biscuits Pvt. Ltd, Case Number: J-25/22/2022-CCPA.

[36] Havells India Ltd, Case Number: CCPA-2/29/2022-CCPA.

[37] Cosmo Skin Centre, Ranchi, Case Number: J-25/46/2022-CCPA.

varied contexts, misleading advertising emerges as the dominant violation type, appearing in 74 cases.

(ii) Analysis of Violation Rates Across Sectors

The CCPA data reveals striking variations in violation rates among different sectors, with several showing extremely high rates. E-commerce, travel, walkies talkie, healthcare establishments, pressure cookers, toys, education, fire safety, and digital payments[38] all show 100 per cent violation rates, though some have small sample sizes. Coaching centres (96 per cent) demonstrate exceptionally high violation rates despite larger case numbers, suggesting systemic compliance issues in this sector. The health products and cosmetics sector shows a lower but still substantial violation rate of 84 per cent. Most notably, the food and beverages sector demonstrates the lowest violation rate at 40 per cent, indicating significantly better compliance. This pronounced cross-sector variation suggests different industry maturity levels regarding consumer protection compliance. A possible reason for the same could be the food and beverages sectors being regulated by a specialised regulator (i.e., the Food Safety and Standards Authority of India), as a result which the industry is largely compliant with the law. On the other hand, coaching centres do not have a specialised regulator, and it is only the CCPA that has acted as a regulator in this sector. In addition, and importantly, the consistently high violation rates across most sectors

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[38] Sectors were identified on the basis of the business sector of the Opposite Party, and not on the violation as such. As cases in relation to pressure cookers took place against the manufacturers and resellers of, and the online marketplaces hosting this type of product, were listed separately. All four cases falling in this category are virtually the same, making pressure cookers a distinct category. The sale of walkie-talkies is another niche area for which the CCPA had to bring separate guidelines. Keeping this in mind, walkie talkies too have been listed as a separate sector.

also reflect CCPA's effective case selection and investigation approach, focusing resources on likely violations rather than conducting random compliance checks.

Table 2: Sector-specific violation rates

Sector	Total Cases	Violations Found	No Violation	Ongoing	Violation Rates (%)
Coaching Centres	30	28	1	1	96.55
Health Products and Cosmetics	25	21	4	0	84
E-Commerce	21	19	0	2	100
Travel	6	6	0	0	100
Food and Beverages	6	2	3	1	40
Walkie Talkies	5	5	0	0	100
Healthcare Establishments	4	4	0	0	100
Pressure Cookers	4	4	0	0	100
Consumer Appliances	4	3	0	1	100
Batteries	3	2	0	1	100
Food Delivery	2	0	0	2	0

Toys	2	2	0	0	100
Restaurants	2	1	0	1	100
Higher Education	1	1	0	0	100
Fire Safety	1	1	0	0	100
Digital Payments	1	1	0	0	100
Furniture	1	0	0	1	0
Total	118	100	8	10	

Source: CCPA Dataset

B. Procedural Analysis

The procedural dimensions of CCPA's enforcement activity offer critical insights into its operational effectiveness and institutional development. Our analysis of all 118 cases examined case initiation patterns, procedural timelines, factors affecting resolution time, and temporal trends in CCPA's operational efficiency. These procedural patterns reveal both institutional strengths and areas for potential improvement in CCPA's enforcement framework.

(i) Case Initiation Patterns

The CCPA dataset reveals distinct patterns in how consumer protection cases are initiated, with a strong preference for *suo moto* actions. Out of a total of 118 cases, 86 (72 per cent) were initiated *suo moto* by the authority itself rather than through external complaints. This proactive enforcement approach suggests the CCPA actively monitors markets[39] and identifies potential violations independently. Only 31 cases (26 per cent) originated from complaint-based investigations, indicating relatively limited reliance on consumer reporting as an enforcement trigger. Of these, only eight complaints were made by individuals; in this, violation was found in six cases, while two are ongoing. Thirteen cases came to the CCPA based on complaints made by the Advertising Standards Council of India (ASCI). Most of the complaint-based cases pertained to health products and cosmetics (10), followed by coaching centres (4). An examination of complaint-based cases revealed that violations were found in about 85 per cent of the cases, whereas in *suo moto* cases, the violation rate was found to be about 94 per cent.

A single case stemmed from a writ petition-based investigation, representing a rare judicial pathway to CCPA action.[40] This distribution demonstrates the authority's preference for self-initiated regulatory oversight rather than reactive complaint resolution. The high proportion of *suo moto* cases likely enhances enforcement consistency by allowing

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[39] Sesa Sen, 'Government to Launch New Apps to Combat Dark Patterns of E-Commerce Companies' (*NDTV Profit*, 22 December 2024) <https://www.ndtvprofit.com/business/government-to-launch-jago-grahak-jago-app-jagriti-app-and-jagriti-dashboard-to-combat-dark-patterns-of-e-commerce-companies> accessed 28 May 2025.

[40] M/s Fire and Personal Safety Enterprises, Case Number: CCPA-11/13/2023-CCPA-Part (1). The case was initiated based on a writ petition in Delhi High Court, which alleged that the Fire and Personal Safety Enterprises had misused the ISI mark on fire extinguisher balls. Investigations found that the company falsely advertised its products as BIS-certified on its website and e-commerce platforms. A search and seizure operation revealed unauthorized use of the ISI mark, which had been used to mislead consumers about the product's safety level. The company later admitted that it had no valid BIS licence and blamed a designer for the error. The CCPA ruled that the Fire and Personal Safety Enterprises had engaged in misleading advertisements and unfair trade practices by falsely claiming BIS certification. The company was fined ₹1,00,000 and ordered to immediately remove the misleading claims from all platforms.

the CCPA to strategically target specific sectors or practices of concern rather than responding to fragmented consumer complaints. In some instances, the CCPA has taken up cases against entities that have a large number of complaints against them on portals like those of the National Consumer Helpline and Grievances Against Misleading Advertisements (GAMA).[41] This approach aligns with modern regulatory best practices that emphasize systematic market surveillance[42] over case-by-case complaint handling.

(ii) Duration of Proceedings

Analysis of case duration metrics reveals significant variation in the time required to resolve CCPA cases. The overall average case duration stands at 372.97 days, based on 93 cases with valid date information. This was calculated by comparing the date of issuance of notice with the date of final order without considering the date of complaint for this, as this data was available only in 13 cases. This substantial overall average case duration reflects the complex investigative and adjudicative processes involved. However, the data shows marked differences in resolution times across years. Cases initiated in 2020 averaged 306.67 days, increasing to 386.83 days for 2021 cases. A notable peak occurred in 2022, when the average duration of resolution reached 437.12 days. However, improvement followed in 2023, with the average duration

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[41] Ministry of Consumer Affairs, Food and Public Distribution, 'Department of Consumer Affairs Launches Portal for Redressal of Grievances against Misleading Advertisements' (*Press Information Bureau*, 18 March 2015) <https://www.pib.gov.in/newsite/PrintRelease.aspx?relid=117262&reg=48&lang=2> accessed 14 June 2026.

[42] Janet Austin, 'Unusual Trade or Market Manipulation? How Market Abuse Is Detected by Securities Regulators, Trading Venues and Self-Regulatory Organizations' [2015] 1 Journal of Financial Regulation 263 <https://doi.org/10.1093/jfr/fjv003>.

falling to 376.64 days. This efficiency continued into 2025, with cases averaging 214.86 days. It was mainly cases in the travel sector that had multiple hearings, which resulted in longer average case duration due to the fact that refunds had to be processed to thousands of consumers and CCPA had to actively monitor the entire process.[43] Also, the figures below will also undergo a change as the CCPA resolves its pendency of at least 11 ongoing cases, including one pending since 2021.[44]

Table 3: Year-wise average case duration

Year of Initiation	Number of Cases	Average Case Duration
2020	3	306.67
2021	18	386.83
2022	26	437.12
2023	25	376.64
2024	14	322.79
2025	7	214.86
Total	93	

Source: CCPA Dataset

(iii) Temporal Trends in CCPA's Efficiency

The dataset being examined demonstrates a clear evolution in CCPA's operational efficiency since its establishment. Case volume shows steady

[43] EasyMyTrip Planners Ltd, Case Number: J-25/25/2021-CCPA.

[44] HUL for its product Horlicks, Case Number: J-25/1/2021-CCPA.

growth from just 3 show cause notices issued in 2020 to 20 in 2021, to 27 notices in 2022, and represents an increase in activity. However, this number came down to 18 in 2024, and just 8 in 2025. While this data has been deduced through the dataset, the annual reports of the CCPA state that the authority issued 85 notices in 2022–23[45] and 99 in 2023–24.[46] Simultaneously, outcome effectiveness has improved substantially, with violation rates rising from 66.67 per cent in 2020 to 84.21 per cent in 2021 to 100 per cent from 2023–25. Most notably, CCPA achieved these improved outcomes while reducing case duration from a peak of 437.12 days in 2022 to 214.86 days in 2025. A possible reason for the same might be changes in staffing in the CCPA as is evident from its annual reports.[47]

Table 4: Year-wise violation rate (based on decided cases)

Year of Initiation	Number of Cases	Violations Found	Violation Rate
2020	3	2	66.67%
2021	19	16	84.21%
2022	26	25	96.15%
2023	25	25	100%

[45] Central Consumer Protection Authority, 'CCPA Annual Report 2022–23' (n 6).
[46] Central Consumer Protection Authority, 'CCPA Annual Report 2023–24' (*Department of Consumer Affairs*, 2025) <https://doca.gov.in/ccpa/annual-report/CCPA-Annual-Report-2023-24.pdf> accessed 10 January 2026.
[47] Central Consumer Protection Authority, 'CCPA Annual Report 2022–23' (n 6); Central Consumer Protection Authority, 'CCPA Annual Report 2023–24' (n 45); Central Consumer Protection Authority, 'CCPA Annual Report 2024–25' (n 28).

2024	14	14	100%
2025	7	7	100%

Source: CCPA Dataset

(iv) Delays in Investigation

Out of the 51 cases for which there was complete information (date of referral to Investigation Wing and date of submission of investigation report), the dataset reveals that the director general completed the investigation within the mandated 30 days[48] in only two cases.[49] The average time from date of initiation of investigation to presentation of the investigation report is 184.37 days. Moreover, the orders issued by the CCPA generally do not reveal whether the director general had sought any extension of time to submit the report. Remarkably, in one case, the investigation took 697 days,[50] while the shortest investigation was completed within 12 days.[51]

Overall, the delays in investigation point out to lack of infrastructure or personnel. As per its last published annual report,[52] CCPA has only six persons in its Investigation Wing which, although is less, is still a significant improvement from having just two personnel in 2022–23.[53]

[48] Regulation 7(2), Central Consumer Protection Authority (Submission of Inquiry or Investigation by the Investigation Wing) Regulations, 2021.
[49] IQRA IAS Institute, Case Number: CCPA-2/37/2022-CCPA; Khan Study Group (KSG), Case Number: CCPA-2/59/2023-CCPA.
[50] Mybooster Retail Private Limited, Case Number: CCPA-2/7/2023-CCPA.
[51] Khan Study Group (KSG), Case Number: CCPA-2/59/2023-CCPA.
[52] Central Consumer Protection Authority, 'CCPA Annual Report 2023–24' (n 45).
[53] Central Consumer Protection Authority, 'CCPA Annual Report 2022–23' (n 6).

C. Remedial Measures Analysis

The remedial dimension of CCPA's enforcement activity provides crucial insights into how the authority operationalizes its consumer protection mandate. Our analysis of remedial measures reveals patterns in the types of remedies ordered, penalty structures, sector-specific approaches, and the evolution of remedial creativity over time. These patterns illuminate CCPA's enforcement philosophy and its impact on regulated entities.

(i) Types of Remedies Ordered

CCPA's enforcement approach reveals a diverse but strategically patterned application of remedies across 100 cases in which violation was found. Monetary penalties, appearing in 69 cases, emerge as the predominant remedy. This emphasis on financial sanctions demonstrates CCPA's preference for economic deterrence mechanisms. However, the annual reports reveal that not all penalties have been paid.[54]

Remedial advertising represents a significant secondary remedy. In several cases, the CCPA ordered corrective, remedial, or disclaimer-based advertisement.[55] Simultaneously, the CCPA ordered the errant

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[54] As per CCPA's annual report for 2022–23, 'During the year in review, a total of 19 Orders were passed including in the matters where Notices were issued in the previous financial years, out of these compliance has been made in 8 matters. In furtherance to it, amongst 19 Orders passed, monetary penalties were imposed on 8 Companies amounting to ₹8,00,000/- whereas penalties were recovered from 2 Companies amounting to ₹2,00,000/- Further, penalty from 2 Companies amounted to ₹ 20,00,000/- was also recovered which were imposed during the previous years.' Similarly, the annual report of 2023–24 points out non-payment of penalties in five cases, which in total amounts to ₹900,000.

[55] Greenlam Industries Ltd, Case Number: J-25/27/2020-CCPA.

entities to withdraw their misleading advertisements.[56] These communication-focused remedies serve both corrective and educational functions, compelling violators to publicly retract false claims.

The remedy selection demonstrates contextual sensitivity: pressure cooker manufacturers and sellers uniformly face recall and monetary penalties as they pertain to public safety and 'make consumers vulnerable to severe injuries, including loss of life'.[57] COVID-related misleading claims in health products typically result in corrective advertising requirements. E-commerce violations frequently trigger both monetary penalties and discontinuation of deceptive practices.[58] Coaching centres face a balanced approach of financial penalties plus mandatory practice modifications.[59] Travel sector cases have mostly had refunds in relation to cancellation of flights during the COVID-19 pandemic. Notably, CCPA demonstrates restraint in applying severe sanctions to first-time, non-egregious violators, often closing cases without penalties when companies voluntarily implement corrective

[56] In Swanrose India Pvt. Ltd, Case Number: CCPA-2/34/2022-CCPA; CCPA investigated a complaint by ASCI against Swanrose India Pvt. Ltd for misleading claims that its hand sanitizer provided '24 hours protection with just one use' and could 'beat the second wave' (of COVID-19). The company removed the advertisement, leading to case closure. In Case Number: J-25/27/2020-CCPA, CCPA investigated Greenlam Industries Ltd for misleading advertisements claiming that its laminates were 'effective against COVID-19', 'anti-bacterial', and had '99.99% efficacy against viruses'. Investigations confirmed that while the product had undergone testing, the advertisement failed to mention the time required for the viruses and bacteria to be eliminated. The company agreed to issue a corrective advertisement with disclaimers. CCPA determined that the advertisement was misleading due to the omission of critical details. Greenlam Industries Ltd agreed to withdraw the misleading advertisement and issue a revised one with appropriate disclaimers. The case was closed without penalties.

[57] Tekshiv Systems Pvt. Ltd Case Number: J-25/72/2021-CCPA (Part 7).

[58] Naaptol Online Shopping Pvt. Ltd, Case Number: J-25/42/2021-CCPA.

[59] Chahal Academy, Case Number: CCPA/24/2023-CCPA.

measures,[60] suggesting a compliance-oriented approach alongside punitive elements.[61]

(ii) Analysis of Penalties Imposed

CCPA's penalty regime reveals a measured but inconsistent approach to monetary sanctions. Of the 100 cases in which violations were found, 69 resulted in monetary penalties, making financial sanctions the most prevalent remedy. The penalty amounts demonstrate significant variation, ranging from ₹500[62] to ₹1,000,000 for traditional regulatory violations, with most penalties clustering between ₹50,000 and ₹1,00,000. Coaching institutes dominated penalty cases, reflecting both their prevalence in violations and CCPA's focus on this sector. The highest individual penalty of ₹10 lakh was imposed on major players like Byju's IAS,[63] ALS IAS,[64] Naaptol,[65] Meesho,[66] and Rapido,[67] suggesting that there is amount calibration based on entity size and violation severity. However, the penalty structure lacks clear graduated guidelines, with similar violations attracting disparate amounts—some coaching

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[60] Berger Paints India Ltd, Case Number: J-25/45/2021-CCPA.
[61] In Rapido's case (Case Number: CCPA-2/35/2024-CCPA), the ride-hailing service provider was ordered to discontinue misleading advertisements, reimburse affected consumers, and pay a penalty of ₹1,000,000.
[62] Anvi Stationary, Case Number: CCPA-2/11/2023-CCPA-Part(2).
[63] Think & Learn Pvt. Ltd for its institute Byju's IAS, Case Number: CCPA/1/2022-CCPA.
[64] Alternative Learning Systems (ALS) IAS, Case Number: CCPA-2/38/2022-CCPA.
[65] Naaptol Online Shopping Pvt. Ltd, Case Number: J-25/42/2021-CCPA.
[66] Meesho (Fashnear Technologies Pvt. Ltd), Case Number: CCPA-2/30/2025-CCPA-Part (1).
[67] Rapido, Case Number: CCPA-2/35/2024-CCPA.

institutes paid ₹10,000,[68] or ₹50,000[69] while others faced ₹5,00,000[70] for comparable misleading advertisement cases.

(iii) Sector-Specific Enforcement Approaches

The CCPA demonstrates distinctly tailored enforcement strategies across different sectors, adapting regulatory tools to sector-specific contexts, consumer vulnerability, violation patterns, and market structures.

In the coaching centre sector (30 cases), the CCPA employs an enforcement approach targeting misleading advertisements about success rates and job guarantees. It imposed penalties in 28 violation cases (with one case not being entertained as it was filed by a competitor and not a consumer and one case being an ongoing one), generally maintaining a fine structure around ₹1–5 lakh per violation. This high-volume standardized enforcement approach likely reflects the CCPA's recognition of systemic misrepresentation issues throughout this sector and the vulnerability of students and parents making significant financial commitments. The enforcement pattern suggests a calibrated approach intended to create broad compliance pressure across numerous market participants rather than targeting a few players with severe penalties. In addition, the CCPA also issued guidelines for coaching centres, but enforcement data shows that violations are still happening.[71]

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[68] Skyway Career Hub, Case Number: J-25/39/2022-CCPA.
[69] Seekers Education, Case Number: J-25/40/2022-CCPA.
[70] Khan Study Group (KSG), CCPA-2/59/2023-CCPA.
[71] Education Desk, 'CCPA Slaps Rs 7 Lakh Penalty on This UPSC Coaching for Misleading CSE Success Rate Claims' (*The Indian Express*, 31 May 2026) <https://indianexpress.com/article/education/ccpa-slaps-penalty-on-upsc-cse-coaching-for-misleading-advertisment-10716633/> accessed 15 June 2026.

Health products and cosmetics (25 cases) reveal a more nuanced enforcement approach, particularly evident during COVID-19-related advertising claims. The CCPA frequently accepted corrective advertising as a sufficient remedy without imposing penalties when companies voluntarily addressed problematic claims about virus protection.[72] This remedial flexibility demonstrates its situational adaptability during public health emergencies while still protecting consumers from misinformation. More recently, some entities have been penalized for misleading advertisements pertaining to fat loss[73] and skin whitening products.[74]

E-commerce enforcement (21 cases) reflects a strategic focus on consumer interface practices rather than comprehensive platform governance. CCPA prioritized cases involving misleading discounts, pricing manipulation, and issues related to false product claims directly visible to consumers, rather than addressing background data practices or technical compliance issues.[75] When violations were found, the remedy was the recall and de-listing of products from the platform. This pattern suggests CCPA is focusing on establishing basic consumer protection principles in digital commerce rather than comprehensive platform regulation, which may involve coordination with other specialized authorities.

The travel sector (with 6 cases) demonstrates the CCPA's most widespread enforcement approach, for which it mostly looked into

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[72] Godrej Consumer Products Ltd, Case Number: J-25/02/2021-CCPA; HUL for its product Lifebuoy, Case Number: CCPA/3/2022-CCPA.
[73] VLCC Healthcare Limited, CCPA-2/73/2023-CCPA.
[74] Suerte Cosmetic Science, J-25/97/2022-CCPA [33747].
[75] Zepto Marketplace Pvt. Ltd, Case Number: Z-10/1/2025-O/0 US(CCPA).

refunds that were due but not processed by online travel companies during the COVID-19 pandemic, and ensured that thousands of customers get their money back. No monetary penalties were imposed on the companies. These cases went on for the longest time, as they involved multiple airlines and customers, with the CCPA dealing with each of them during the hearings. At the same time, in 2024, the CCPA ordered IndiGo airlines to '(1) Comply with the DGCA Circular on seat allocation' and '(2) Modify the web check-in process to clearly inform customers about seat selection'.[76]

The only instance where a penalty was imposed on an entity in the travel sector was when the CCPA fined Rapido ₹10 lakhs for misleading advertisements. Rapido had promised 'Guaranteed Autos' and an 'Auto in 5 min or get ₹50' without properly disclosing that the compensation would only be 'up to ₹50' and that too in Rapido coins (not cash), which would be redeemable only for bike rides within 7 days. Further, the guarantee was not even provided by Rapido but by individual captains. In addition to the penalty, Rapido was also ordered to discontinue the advertisement.[77]

Pressure cooker cases (4 in number) involving manufacturers or sellers demonstrate a highly standardized compliance-oriented approach focusing on technical BIS certification requirements. All cases resulted in violations with consistent penalties of around ₹1 lakh, suggesting a routine compliance verification programme rather than case-specific

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[76] InterGlobe Aviation Ltd (IndiGo Airlines), Case Number: CCPA-2/10/2024-CCPA.
[77] Rapido, Case Number: CCPA-2/35/2024-CCPA.

investigations. This approach indicates the CCPA's role in enforcing mandatory safety standards through regular market surveillance.

The food and beverages sector (with 6 cases under study) exhibits one of the lowest violation rates (40 per cent) and minimal penalties, suggesting either strong pre-existing regulatory compliance due to established oversight or the CCPA's strategic deference to the specialized food safety regulatory framework.[78] When violations were found, they primarily involved misleading nutritional or health benefit claims where consumer protection interests directly intersect with food regulations.

This sectoral analysis reveals that the CCPA relies on a sophisticated regulatory strategy that deploys different enforcement intensities and remedy types based on sector characteristics, existing regulatory frameworks, violation patterns, and consumer vulnerability. Rather than a one-size-fits-all approach, it demonstrates strategic prioritization, inter-regulatory coordination,[79] and calibrated interventions designed to maximize consumer protection impact while efficiently allocating limited regulatory resources.

IV. THE PREVENTIVE DIMENSION: ADVISORIES AND GUIDELINES

The CCPA's preventive regulatory function has evolved significantly since its establishment, transitioning from reactive responses to isolated issues towards a more strategic and systematic approach to market-wide consumer protection

[78] HUL for its product Boost, Case Number: J-25/5/2021-CCPA.
[79] Lohiya Retails, Case Number: J-25/97/2022-CCPA; HUL for its product Boost, Case Number: J-25/5/2021-CCPA.

challenges. In this role, the CCPA seeks to prevent consumer harm through advisories and guidelines. These regulatory tools clarify legal obligations, address emerging market practices, and promote compliance before violations become widespread. This section examines the evolution of the CCPA's preventive function and the growing role of advisories and guidelines in shaping consumer protection standards across sectors.

A. Evolution of CCPA's Advisory Function

The CCPA's advisory function has become an increasingly important dimension of CCPA's regulatory toolkit alongside its enforcement powers. Advisories are generally a restatement of the legal provisions applicable to a sector; they are made public and shared with industry organisations for wider circulation. Violating an advisory is not punishable per se but would invariably involve violating some provision of Consumer Protection Act 2019, or any of its delegated legislations, which are otherwise punishable.

Table 5: Advisories Issued by CCPA until 31 December 2025

Serial No.	**Date**	**Advisory**	**Role**
1.	20 January 2021	Advisory pertaining to misleading advertisements[80]	Targeted misleading advertisements exploiting COVID-19 anxieties with unsubstantiated immunity-boosting claims

[80] Central Consumer Protection Authority, 'Advisory in Terms of Consumer Protection, 2019 for Resorting to Misleading Advertisements' (*Department of Consumer Affairs*, 20 January 2021) <https://doca.gov.in/ccpa/files/Advisory-1.pdf> accessed 16 May 2025.

2.	30 September 2021	Advisory for displaying information provided by sellers to marketplace e-commerce platforms[81]	Required marketplace e-commerce entities to prominently display seller information as mandated by Rule 5(3)(e) of the E-Commerce Rules
3.	29 April 2022	Advisory concerning the illegal facilitation and sale of wireless jammers on e-commerce platforms[82]	Prohibited sale of jammers on e-commerce platforms
4.	14 July 2022	Advisory concerning sale of Ayurvedic, Siddha, and Unani drugs containing ingredients listed in Schedule (E)(1) of the Drug and Cosmetic Rules, 1945 on e-commerce platforms[83]	Addressed the specific risk of such drugs being purchased without medical supervision
5.	10 May 2023	Advisory on risk to life and safety of consumers	Prohibited manufacturers, sellers, and e-commerce

81 Central Consumer Protection Authority, 'Advisory in Terms of Consumer Protection (E-Commerce) Rules, 2020 for Displaying Information Provided by Sellers to Marketplace Ecommerce Platforms' (*Department of Consumer Affairs*, 30 September 2021) <https://doca.gov.in/ccpa/files/Advisory-2.pdf> accessed 16 May 2025.

82 Central Consumer Protection Authority, 'Advisory in Terms of Consumer Protection Act, 2019 Concerning Illegal Facilitation and Sale of Wireless Jammers on e-Commerce Platforms' (*Department of Consumer Affairs*, 29 April 2022) <https://doca.gov.in/ccpa/files/Advisory-3.pdf> accessed 16 May 2025.

83 Central Consumer Protection Authority, 'Advisory in Terms of Consumer Protection Act, 2019 Concerning Sale of Ayurvedic, Siddha and Unani Drugs Containing Ingredients Listed in Schedule E (1) of the Drugs and Cosmetics Rules, 1945 on e-Commerce Platforms' (*Department of Consumer Affairs*, 14 July 2022) <https://doca.gov.in/ccpa/files/Advisory-4.pdf> accessed 16 May 2025.

		through sale of car seat belt alarm stopper[84]	entities from dealing in sale of car seat belt alarm stopper
6.	6 March 2024	Advisory on the prohibition of advertising, promotion, and endorsement of unlawful activities that are anyway prohibited under various laws[85]	Addressed betting and gambling advertisements, indicating CCPA's willingness to address socially harmful promotional practices beyond traditional consumer protection concerns
7.	5 June 2025	Advisory on self-audit by e-commerce platforms for detecting dark patterns on their platforms to create a fair, ethical, and consumer-centric digital ecosystem[86]	Advised e-commerce platforms to conduct self-audits to identify dark patterns and submit self-declarations. (A total of 19 platforms submitted such declarations.)

[84] Central Consumer Protection Authority, 'Advisory in Terms of Consumer Protection Act, 2019, on Risk to Life & Safety of Consumers through Sale of Car Seat Belt Alarm Stopper' (*Department of Consumer Affairs*, 10 May 2023) <https://doca.gov.in/ccpa/files/Advisory-5.pdf> accessed 16 May 2025.

[85] Central Consumer Protection Authority, 'Advisory in Terms of Consumer Protection Act, 2019 on Prohibition of Advertising, Promotion, and Endorsement of Unlawful Activities Prohibited under Various Laws' (*Department of Consumer Affairs*, 6 March 2024) <https://doca.gov.in/ccpa/files/Advisory-6.pdf> accessed 16 May 2025.

[86] Central Consumer Protection Authority, 'CCPA Advisory in Terms of Consumer Protection Act, 2019 on Self-Audit by E-Commerce Platforms for Detecting the Dark Patterns on Their Platforms to Create a Fair, Ethical, and Consumer-Centric Digital Ecosystem' (*Department of Consumer Affairs*, 5 June 2025) <https://doca.gov.in/ccpa/files/Advisory-7.pdf> accessed 10 January 2026.

Source: CCPA Dataset

The chronological progression outlined in the table above reveals CCPA's increasing institutional confidence in utilising its advisory function as a preventive regulatory tool, with expansion from narrowly defined pandemic issues towards comprehensive market governance addressing both traditional and emerging consumer protection challenges.

(i) Circumstances Triggering Advisory Issuance

Our analysis also identifies several distinct patterns in the circumstances that have triggered CCPA's issuance of major advisories:

1. Response to Emerging Market Practices: Several advisories were triggered by CCPA's identification of novel market practices with potential consumer harm. The advisory on car seat belt alarm stoppers[87] exemplifies this pattern, with CCPA noting that such products 'compromise the safety of passengers and the public' in violation of consumers' right to protection against hazardous products.

2. Inter-agency Coordination: A significant number of advisories resulted from coordination with other regulatory authorities identifying consumer protection dimensions of sectoral issues.[88] The wireless

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[87] Central Consumer Protection Authority, 'Advisory in Terms of Consumer Protection Act, 2019, on Risk to Life & Safety of Consumers through Sale of Car Seat Belt Alarm Stopper' (n 83).

[88] ibid; Central Consumer Protection Authority, 'Advisory in Terms of Consumer Protection Act, 2019 Concerning Sale of Ayurvedic, Siddha and Unani Drugs Containing Ingredients Listed in Schedule E (1) of the Drugs and Cosmetics Rules, 1945 on e-Commerce Platforms' (n 82).

jammers advisory[89] explicitly referenced prior communications from the Department of Telecommunication and the Department of Promotion of Industry and Internal Trade, illustrating how CCPA's advisory function complements specialized regulatory frameworks.

3. Systematic Market Monitoring: CCPA's evolving market monitoring capabilities have increasingly triggered proactive advisories addressing emerging issues. The advisory on misleading advertisements during COVID-19[90] specifically mentioned that it 'has come to the notice' of CCPA that manufacturers were making unsubstantiated immunity claims, suggesting systematic monitoring rather than complaint-driven response.

4. Media and Public Attention: Public discourse and media coverage of consumer protection issues have triggered several advisories, particularly those addressing practices with broader social implications.[91] The March 2024 advisory on gambling advertisements[92] noted 'increasing instances' of such promotions, suggesting that the CCPA's media monitoring sometimes acts a trigger for its efficient functioning.

These patterns demonstrate CCPA's responsiveness and approach to emerging consumer protection challenges, combining proactive

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[89] Central Consumer Protection Authority, 'Advisory in Terms of Consumer Protection Act, 2019 Concerning Illegal Facilitation and Sale of Wireless Jammers on e-Commerce Platforms' (n 81).
[90] Central Consumer Protection Authority, 'Advisory in Terms of Consumer Protection, 2019 for Resorting to Misleading Advertisements' (n 79).
[91] ibid; Central Consumer Protection Authority, 'Advisory in Terms of Consumer Protection Act, 2019 on Prohibition of Advertising, Promotion, and Endorsement of Unlawful Activities Prohibited under Various Laws' (n 84).
[92] ibid.

monitoring with inter-agency coordination to identify issues requiring preventive intervention.

(ii) Guidelines as Regulatory Tools

The CCPA has increasingly utilised its power to issue formal guidelines as a significant preventive regulatory mechanism. Unlike advisories, which typically address specific market practices or sectors, guidelines are delegated legislation and source their origin to the statute.[93] Guidelines establish comprehensive regulatory frameworks addressing systemic consumer protection challenges. This section examines the CCPA's major guidelines on coaching centres, dark patterns, greenwashing, and misleading advertisements, analysing their substantive approach, implementation mechanisms, and relationships with enforcement actions.

(iii) Analysis of Major Guidelines

Between 2022 and 2025, CCPA issued six significant sets of guidelines establishing regulatory frameworks for diverse consumer protection domains. These guidelines reveal CCPA's evolving approach to preventive regulation and its increasing sophistication in addressing complex market practices.

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[93] Consumer Protection Act 2019, s 18(2)(l).

Table 6: Guidelines issued by CCPA before 31 December 2025

Serial No.	Date	Guideline	Role
1.	9 June 2022	Guidelines for Prevention of Misleading Advertisements[94]	Regulated surrogate advertising, bait advertisements, free claims, and children-targeted advertisements
2.	4 July 2022	Guidelines to Prevent Unfair Trade Practices and Protection of Consumer Interest with Regard to Levy of Service Charge in Hotels and Restaurants[95]	Hotels and restaurants cannot add or demand service charges; paying them is entirely voluntary and at the consumer's discretion
3.	30 November 2023	Guidelines for Prevention and Regulation of Dark Patterns[96]	Defined dark patterns and enumerated 13 specific dark pattern practices and demonstrated CCPA's adaptive

[94] Ministry of Consumer Affairs, Food and Public Distribution, 'Centre Issues "Guidelines on Prevention of Misleading Advertisements and Endorsements for Misleading Advertisements, 2022"' (*Press Information Bureau*, 10 June 2022) <https://www.pib.gov.in/www.pib.gov.in/Pressreleaseshare.aspx?PRID=1832906> accessed 16 May 2025.
[95] Central Consumer Protection Authority, 'Guidelines to Prevent Unfair Trade Practices and Protection of Consumer Interest with Regard to Levy of Service Charge in Hotels and Restaurants' (n 16).
[96] Ministry of Consumer Affairs, Food and Public Distribution, 'Central Consumer Protection Authority Issues "Guidelines for Prevention and Regulation of Dark

			response to digital market challenges, extending consumer protection principles to user interface design and digital interaction patterns
4.	15 October 2024	Guidelines for Prevention and Regulation of Greenwashing or Misleading Environmental Claims, 2024[97]	Established specific requirements for substantiating environmental claims, with particular focus on generic terms like 'green', 'eco-friendly', or 'sustainable', and detailed disclosure requirements for environmental claims, mandating that advertisers specify whether claims refer to products as a whole, manufacturing processes, packaging, use, or disposal
5.	13 November 2024	Guidelines for Prevention of Misleading Advertisement in Coaching Sector	Defined 'coaching' broadly to include academic support, education, guidance, and tuition activities serving more than 50 students and enumerated specific conditions constituting misleading advertisements in

Patterns, 2023" for Prevention and Regulation of Dark Patterns Listing 13 Specified Dark Patterns' (n 16).
[97] Central Consumer Protection Authority, 'Guidelines for Prevention and Regulation of Greenwashing or Misleading Environmental Claims, 2024' (n 16).

			coaching, including false claims regarding course offerings, faculty credentials, success rates, and false guarantees of selection, job security, or examination performance
6.	27 May 2025	Guidelines for the Prevention and Regulation of Illegal Listing and Sale of Radio Equipment including Walkie Talkies on E-Commerce Platforms, 2025[98]	Prohibited the illegal listing and sale of uncertified or unauthorized radio equipment on e-commerce platforms and mandate strict compliance, monitoring, and enforcement measures

Source: CCPA Dataset

This sequential development of guidelines reveals CCPA's strategic prioritization of regulatory domains based on enforcement data and market monitoring. The progression from general misleading advertisement standards to sector-specific (coaching) and practice-specific (dark patterns, greenwashing) frameworks demonstrates CCPA's increasingly targeted approach to preventive regulation.

[98] Central Consumer Protection Authority, 'Guidelines for the Prevention and Regulation of Illegal Listing and Sale of Radio Equipment Including Walkie Talkies on E-Commerce Platforms, 2025' (n 16).

(iv) Interdependence Between Guidelines and Enforcement Actions: CCPA's Regulatory Approach

The interdependence between the CCPA guidelines and enforcement actions reveals a sophisticated regulatory approach under the Consumer Protection Act 2019. These guidelines appear to emerge directly from enforcement patterns observed in the 118 cases contained in the CCPA dataset. The pattern reveals a responsive regulatory framework that adapts to emerging consumer protection challenges through a continuous cycle of enforcement and guideline development.

A clear example of this interdependence can be seen in cases involving COVID-19 protection claims. The dataset shows multiple enforcement actions against companies like Godrej Consumer Products and Century Plyboards for making misleading claims about virus protection. In the Godrej case, the company claimed its hand wash product was effective against COVID-19 but failed to mention that its effectiveness required a minimum of one-minute contact time. Similarly, Century Plyboards advertised that its laminates could 'kill 99.99% of viruses' without disclosing that virus elimination took 24 hours. These enforcement actions likely informed the development of later guidelines on misleading advertisements, which specifically address requirements for proper disclosure of material information and prohibit exaggerating product effectiveness.

The November 2024 guidelines on misleading advertisements in the coaching sector represent another example of this regulatory approach. Section 3 defines specific conditions constituting misleading advertisements, including 'false claims regarding number of selections, rank in exam or success rate' and 'guaranteed selection, job security, job promotions'. These provisions address common deceptive practices in coaching advertising and provide enforcement personnel with specific criteria for identifying violations. This specificity likely emerged from the CCPA's experience with enforcement actions in the education sector, where ambiguity may have previously hampered effective regulation.

The latest example of this regulatory feature of a feedback loop—i.e., where the enforcement shapes the guidelines—is the guideline on sale of radio equipment and walkie talkies.[99] These guidelines were introduced on 27 May 2025, noticeably after the CCPA took *suo moto* cognizance and issued five notices between 7 and 22 May 2025.

Throughout this evolution, the CCPA has maintained consistent structural elements across its guidelines: clear definitions, specific application scopes, detailed prohibited practices, and comprehensive disclosure requirements. Each new set of guidelines references and builds upon earlier guidance, creating an increasingly robust regulatory framework. This systematic approach demonstrates how the CCPA's regulatory strategy has matured through the iterative process of enforcement, guideline development, and further enforcement, creating a regulatory ecosystem that continuously adapts to protect Indian consumers from evolving deceptive practices.

V. CONCLUSIONS

This article presents the first comprehensive empirical analysis of the Central Consumer Protection Authority's functioning from 2020 to

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[99] ibid.

2025, drawing on a systematic dataset of 165 orders across 118 cases. The findings reveal an institution that has evolved rapidly from a nascent regulatory body into a sophisticated market regulator, fundamentally reorienting India's consumer protection framework. The most significant finding is the CCPA's decisive shift towards proactive market governance. With 72 per cent of cases initiated *suo moto*, the authority has moved well beyond the complaint-driven model that characterised the pre-2019 regime. This represents a structural re-conception of what consumer protection requires in markets defined by information asymmetries, digital complexity, and systemic deception. The high violation rates across sectors (96 per cent in coaching and 100 per cent in e-commerce) suggest that this proactive posture is empirically justified and that the CCPA has developed effective mechanisms for identifying sectors where consumer harm is endemic rather than episodic.

Equally significant is the iterative relationship between enforcement and rulemaking. The CCPA has not treated guidelines as standalone instruments; rather, enforcement experience has directly shaped regulatory frameworks, most clearly in the coaching sector guidelines and the walkie-talkie regulations. This feedback loop between investigation and standard setting reflects institutional maturity and points towards a model of adaptive regulation suited to rapidly evolving markets. Operational efficiency has also improved. The reduction in average case duration from 437 days in 2022 to 214 days in 2025 indicates genuine institutional learning.

That said, the article identifies persistent structural weaknesses that cannot be dismissed. The investigation wing remains severely understaffed, with only six investigators handling the nationwide caseload. Penalty non-collection in multiple cases erodes deterrence. Resistance to RTI applications and delayed publication of annual reports signal transparency deficits that undermine public accountability.

On reforms, the CCPA should establish a publicly accessible case management system akin to court portals, with unique case identifiers and downloadable orders. A structured penalty framework linking sanction levels to violation severity and respondent size would address the current inconsistency. Most importantly, meaningful investment in investigative infrastructure is essential if the authority is to sustain its enforcement effectiveness at scale.

To conclude, the CCPA's first five years demonstrate that India's consumer protection framework has crossed a qualitative threshold: from grievance resolution to market governance. Whether that transition proves durable will depend on resolving the institutional bottlenecks identified in this article.