

Central Consumer Protection Authority

Krishi Bhawan, New Delhi - 110001

Case No: CCPA-2/47/2026-CCPA

In the matter of: Misleading advertisement, unfair trade practice and violation of consumer rights by Weblink.In Private Limited (trading as ExportersIndia.com and referred to in the Show Cause Notice as "Exporters India Limited") through the listing, hosting, advertising and facilitation of sale of Ammonium Nitrate and Pentaerythritol Tetranitrate (PETN), regulated and hazardous explosive substances, on its e-commerce platform, in contravention of the Consumer Protection Act, 2019 and the Consumer Protection (E-Commerce) Rules, 2020, read with the Explosives Act, 1884, the Explosive Substances Act, 1908 and the Ammonium Nitrate Rules, 2012.

CORAM:

Mrs. Nidhi Khare, Chief Commissioner

Mr. Anupam Mishra, Commissioner

APPEARANCES

For Weblink.In Private Limited: -

1. Mr. Sukrit R. Kapoor, Advocate
2. Mr. Vijay Shankar V.L., Advocate
3. Mr. Ashmit Dhawan, Advocate

Date: 08.09.2026

ORDER

1. The Central Consumer Protection Authority (hereinafter referred to as 'CCPA' or 'the Authority') has been established under Section 10 of the Consumer Protection Act, 2019 (hereinafter referred to as 'the Act') to regulate matters relating to violation of consumer rights, unfair trade practices and false or misleading advertisements prejudicial to the interest of the public and consumers and to promote, protect and enforce the rights of consumers as a class. Section 18(1) of the Act provides that the Central Authority shall ensure that no false or misleading advertisement is made of any goods or services, prevent unfair trade practices and

ensure that no person engages in unfair trade practices. Section 2(9) of the Act further recognises the right of consumers to be protected against the marketing of goods, products, or services which are hazardous to life and property.

2. In exercise of its powers under Sections 18 and 19 of the Act, the CCPA carried out a sector-wide review of various e-commerce platforms to ascertain whether hazardous chemicals, explosive substances and related precursors including Ammonium Nitrate, Gun Powder, Picric Acid and Pentaerythritol Tetranitrate (PETN), all of which stand regulated, restricted or prohibited under the Explosives Act, 1884, the rules framed thereunder and other applicable law were being listed, hosted, advertised or otherwise made available for sale online.

3. In the course of preliminary inquiry, the CCPA found that a number of e-commerce entities and online platforms were permitting the listing, advertisement and facilitation of sale of such regulated and hazardous substances, thereby enabling access to highly sensitive materials without appropriate regulatory disclosures, warnings or traceability safeguards and exposing consumers and the public at large to serious risks to safety and security.

4. From the perusal of preliminary inquiry report, the CCPA found that Ammonium Nitrate and Pentaerythritol Tetranitrate (PETN) were being listed, hosted, advertised and made available for purchase on the e-commerce platform ExportersIndia.com (www.exportersindia.com), operated by Weblink.In Private Limited (hereinafter 'the opposite party'), while allegedly concealing:

- i. Valid PESO (Petroleum and Explosives Safety Organisation) licence details of the seller;
- ii. Identity and licensed status of the buyer prior to completion of the transaction;
- iii. Mechanisms for ensuring traceability of transactions, as mandated under the Ammonium Nitrate Rules, 2012; and
- iv. Appropriate disclosures, cautions, or regulatory notices regarding the legal restrictions on the possession and use of the said substances and the penal consequences of unauthorised possession under the Explosives Act, 1884. **(Annexure- 1)**

5. Ammonium Nitrate (having the chemical formula NH_4NO_3 , or any combination containing more than 45 per cent of Ammonium Nitrate by weight) has been declared to be an 'explosive' by the Central Government vide Notification No. S.O. 1678(E) dated 21st July, 2011, issued under Section 17 of the Explosives Act, 1884. Pentaerythritol Tetranitrate (PETN)

is a 'special category explosive substance' under the Explosive Substances Act, 1908, the Explosives Act, 1884 and the Explosives Rules, 2008, being a high-order explosive with a well-documented history of misuse in improvised explosive devices. Both substances are highly reactive and capable of being used in the manufacture of improvised explosives, thereby posing a grave risk to public safety and national security if their sale, possession, transport and use are not strictly regulated.

6. Taking cognizance of the above and in exercise of powers under the Act, the CCPA issued a Show Cause Notice dated 7th May, 2026 to the opposite party calling upon it to furnish a response within 15 days along with supporting documents including:

- i. A list of all current and past listings of Ammonium Nitrate and PETN;
- ii. Complete details of sellers listing the said substances along with their regulatory compliance details;
- iii. Quantities sold in the last two years;
- iv. Copies of licences verified for sellers and buyers; details of the buyer-verification mechanism; and
- v. Details of any imports.

7. The opposite party, through Weblink.In Private Limited, submitted its reply dated 21st May, 2026 wherein it made the following submissions:-

- i. That no legal entity by the name "Exporters India Limited" exists and that the platform ExportersIndia.com is owned and operated by Weblink.In Private Limited.
- ii. Upon receipt of the notice, the identified listings had been temporarily disabled from public visibility, to be permanently deleted after 15 days unless further instruction from the authority, with the underlying information being preserved.
- iii. ExportersIndia.com is not a transactional e-commerce inventory platform. It does not provide any direct "add-to-cart", checkout, escrow, delivery, logistics, warehousing, product custody, invoicing or payment settlement mechanism for such third-party goods. Any commercial dealing, if at all undertaken, is independent between buyer and seller and outside the control, knowledge, possession and participation of the platform.
- iv. The platform does not manufacture, store, stock, possess, sell, transport, import, export, deliver, invoice, warehouse or physically handle any product listed by third-party users on the platform. The Company does not operate as a dealer, distributor, trader, consignee, transporter or licensed operator in respect of Ammonium Nitrate, PETN or any other explosive/regulated substance.

- v. That ExportersIndia.com is a B2B online information/intermediary platform providing digital infrastructure for publication and discovery of business listings uploaded by independent third-party users and does not control and is not responsible for, the quality, safety, lawfulness, availability or fulfilment of products/services offered by such users, nor does it itself manufacture, store, stock, possess, sell, transport, import, export, deliver, supply or hold inventory of any goods listed, or issue invoices for goods sold by third-party sellers.
- vi. That the platform's Terms & Conditions require users to furnish accurate information, use the platform only for lawful purposes and refrain from posting content whose sale is prohibited under applicable law and reserve the Company's right to remove unlawful content, cooperate with government authorities, disclose user details where legally required and suspend or terminate accounts; accordingly, any listing is essentially third-party information hosted on an intermediary platform and the Company cannot be equated with a manufacturer, seller, supplier or user of the goods concerned.
- vii. That the screenshots annexed with the Show Cause Notice themselves show independent third-party seller names and listing cards and an enquiry/contact-based functionality, rather than any platform-controlled sale, checkout, delivery or payment mechanism; and that the statutory requirements under the Explosives Act, 1884, the Explosives Rules, 2008, the Ammonium Nitrate Rules, 2012 and other related law concerning manufacture, possession, storage, sale, transport and physical handling of regulated substances are primarily applicable to persons/entities actually undertaking such regulated activity, which the opposite party, as an intermediary digital host, does not undertake.
- viii. That, without prejudice to the foregoing, the opposite party maintains a due-diligence mechanism, including a blacklist/prohibited-keyword mechanism developed with reference to available government/regulatory/publicly accessible restricted lists (including materials maintained by bodies such as the NCB/INCB, wherever applicable); that, pursuant to the present notice specifically, the terms "Ammonium Nitrate", "Pentaerythritol Tetranitrate" and "PETN" and associated variations were added to this mechanism; and that the opposite party expressed willingness to incorporate any further list of prohibited/restricted substances, synonyms or CAS numbers that the Authority may provide.
- ix. That the opposite party had no intention, knowledge, control, possession or role in any unlawful sale or misuse of the substances referred to in the notice and that, upon the matter being brought to its notice, it acted promptly and in good faith by removing the

listings, updating its filter/blacklist mechanism and initiating an internal compliance review, such that no adverse inference of intentional concealment, misleading advertisement or unfair trade practice ought to be drawn against it.

- x. That the opposite party does not adopt any unfair trade practice and has not made any misleading advertisement, the impugned listings being third-party user-generated content neither authored nor independently advertised as its own goods; and that Rule 5 of the Consumer Protection (E-Commerce) Rules, 2020 stands complied with, inasmuch as it follows intermediary due-diligence standards under the Information Technology Act, 2000 and took prompt corrective action upon acquiring knowledge.
- xi. That ExportersIndia.com falls in the category of an intermediary platform hosting third-party electronic records and does not itself carry on any regulated activity requiring a PESO licence; and that, while it did not have prior knowledge of the specific products or terms in issue, it acknowledged, upon receipt of the notice, that Ammonium Nitrate and PETN are regulated under the applicable statutory framework, while reiterating that the said framework governs persons/entities actually undertaking such regulated activity and not an intermediary platform such as itself.
- xii. That the allegation of failure to disclose Grievance Officer contact details was denied, such details having already been disclosed on the platform's Terms & Conditions page and website header prior to the notice, though, without prejudice, the opposite party was reviewing the display format to make such details more prominently accessible.
- xiii. In response to the specific information sought at paragraph 16 of the notice: that lists of current and past listings and seller details were furnished as annexures; that the opposite party has not itself sold any quantity of either substance and, not processing sale transactions, invoices, delivery or settlement between users, does not possess data of quantities sold by independent sellers; and that no imports of the said substances have been undertaken, it being an IT service provider.
- xiv. That no licences were sought or verified by the opposite party for sellers or buyers, on the stated ground that it had no knowledge of the restrictions applicable to the listings and was not in a position to verify such licences and disabled the listings upon the matter coming to its knowledge; and that no buyer-verification mechanism is adopted, since, on its case, no transaction takes place through the platform and it has no knowledge of any transaction between users.
- xv. That the opposite party has always cooperated with government departments, regulators and law-enforcement agencies, reiterated its willingness to assist the CCPA with available records, requested the Authority to share any official list of

prohibited/restricted substances for incorporation into its blacklist mechanism and undertook to continue strengthening its compliance framework.

8. The CCPA examined the opposite party's reply and observed the following:-
 - i. Data furnished by the opposite party's own annexures prima facie indicated that transactions in Ammonium Nitrate and PETN had occurred in India over the preceding two years through its platform.
 - ii. The opposite party's response i.e. temporary removal of the listings, liable to be restored unless further instructions, coupled with its admitted absence of any effective seller-monitoring mechanism was found inadequate given the gravity of hosting explosive substances.
 - iii. The plea of being a non-transactional intermediary, or that the content was third-party/user-generated, did not conclusively rule out non-compliance with disclosure, due-diligence, licensing and verification obligations, which could not be discharged merely through the opposite party's Terms & Conditions.
 - iv. The claimed safe-harbour under Section 79 of the IT Act, 2000 was found prima facie unavailable, the opposite party having neither observed due diligence under Section 79(2) (c) nor permanently disabled access despite actual knowledge, as required under Section 79(3).
 - v. The opposite party had not produced adequate records of any user-verification mechanism or restricted-access system said to have been applied to the listings.
 - vi. The plea disclaiming responsibility for user-offered products was found untenable, an intermediary not being entitled to evade due-diligence obligations under the IT Act, 2000 merely by invoking intermediary status; reliance on Rule 5 of the Consumer Protection (E-Commerce) Rules, 2020 also remained unsubstantiated for want of demonstrated compliance with Section 79(2)/(3).
 - vii. The admitted lack of prior knowledge of the regulated nature of the products was found prima facie indicative of inadequate monitoring and non-compliance with Rule 4(3) of the said Rules.
 - viii. Grievance Officer details appeared updated only after the notice and blocking of the listings only upon its receipt, were both found prima facie indicative of prior non-compliance and of the products having remained available before regulatory intervention.

9. In view of the above, the CCPA formed the prima facie view that a case of unfair trade practice and misleading advertisement under Sections 2(47) and 2(28) of the Act read with the Consumer Protection (E-Commerce) Rules, 2020 was made out against the opposite party and accordingly in exercise of powers under Section 19(1) of the Act, CCPA vide letter dated 1st June, 2026 requested DG (Investigation) for a detailed investigation into the matter.

10. The DG (Investigation) submitted its Investigation Report on 07th August, 2026. The key findings of the Investigation Report are summarized below:

- i. The Investigation Report records that the opposite party did not extend timely cooperation to the investigation. A notice dated 15th June, 2026 issued by the DG (Investigation Wing) directing the opposite party to submit its response was followed by an email dated 24th June, 2026 from the ADG (Investigation Wing) seeking documentary evidence; no response was received to either communication. A final reminder was issued on 1st July, 2026, to which, again, no response was furnished. The ADG (Investigation Wing) thereafter made repeated attempts to contact the opposite party through emails and telephonic conversations and issued a further letter by Speed Post dated 23rd July, 2026. The opposite party furnished its response only on 31st July, 2026 and 3rd August, 2026, attributing its earlier non-response to the CCPA's and the DG's communications having gone into its spam folder.
- ii. During the course of the investigation, it was observed that the company hosted and facilitated the sale of Ammonium Nitrate and Pentaerythritol Tetranitrate (PETN) on its platform up to and including April 2026 without ensuring compliance with mandatory regulatory safeguards. The listings neither disclose nor verify the seller's valid PESO licence, the buyer's eligibility. Further, the platform fails to display appropriate warnings to the consumers regarding the legal restrictions governing the possession, purchase and use of Ammonium Nitrate, as well as the penal consequences arising from unauthorised possession.
- iii. The omission of such material information specifically regarding the licensing requirements, buyer's eligibility and lawful usage conditions deprives consumers of essential information required to make informed purchasing decisions and exposes them to legal and safety risks.
- iv. Although the company subsequently removed the impugned listings from its platform and implemented a blacklist/prohibited keyword mechanism, such removal does not absolve it of liability for the period during which the products remained available for

sale. Subsequent corrective measures cannot negate or cure the violation that has already occurred.

- v. The company's reliance on its status as an intermediary is not sufficient to avoid responsibility. As a marketplace e-commerce entity facilitating transactions between buyers and sellers, it is required to exercise reasonable due diligence and oversight over listings hosted on its platform. The company cannot disclaim responsibility solely because the products were uploaded by third-party sellers.
- vi. The company's submission that the impugned listings were uploaded by third-party sellers who had accepted the platform's Terms & Conditions, thereby assuming sole responsibility for the legality of the listings, is not tenable. The ability of sellers to upload and maintain listings of a highly regulated substance without adequate scrutiny reflects gross negligence and deficiencies in the company's seller onboarding procedures, product verification and content moderation mechanisms.
- vii. Such deficiencies demonstrate a failure on the part of the company to exercise the degree of due diligence expected of a marketplace platform dealing with regulated products. This responsibility cannot be avoided or contractually delegated to third-party sellers.
- viii. Further, the company failed to furnish proper documentary evidence regarding the quantity of Ammonium Nitrate and PETN sold by each seller as well as copies of valid licences issued by the competent authority that were verified for each such seller. Even assuming the company functions as an intermediary, it is expected to maintain and produce reasonable records demonstrating the due diligence measures undertaken by it in respect of regulated products.
- ix. The company contends that it does not earn revenue from the actual sale of products. However, it earns revenue through membership fees paid by sellers for listing their products on its platform. The very existence of a paid membership model indicates that sellers who pay such fees receive certain benefits and advantages over non-members. In such circumstances, the company's role cannot be regarded as that of a purely intermediary/information platform.
- x. Furthermore, where the company earns revenue from the listing of products, it assumes a corresponding obligation to exercise reasonable oversight and monitoring of such listings. Permitting regulated products to be listed without adequate scrutiny while simultaneously generating revenue from listing-related services raises serious concerns regarding compliance and accountability.

- xi. Additionally, the company's contention that it is an information platform where third-party users create business profiles and upload product information and that any commercial dealing is outside the control, knowledge, possession and participation of the platform. However, the investigation reveals that the platform enables real-time communication, negotiation and exchange of product details between buyers and sellers within its own interface. Such structured facilitation of interactions goes beyond a passive information platform and is inconsistent with the company's submissions.
- xii. Although transactions may not be formally concluded through the platform itself, the in-platform chat substantially contributes to the discussions regarding the products. This degree of involvement distinguishes the platform from a mere intermediary and warrants closer scrutiny under the Consumer Protection Act, 2019 and the obligations applicable to marketplace e-commerce entities.
- xiii. A significant contradiction emerged in the stand taken by the company. The company's claim of being a mere intermediary is inconsistent with its actual business practices. Under its "Membership Plan", the company offers paid plans that provide sellers with greater visibility and exposure for their products. It also offers a V-Trust Certificate for an additional fee, indicating to customers that the seller has been verified by the platform.
- xiv. Various testimonials available on the website also demonstrate that the company's paid membership services help sellers increase sales and engage with more buyers. This indicates that the company actively promotes and gives greater visibility to sellers who purchase its membership plans, thereby conferring commercial advantages on paying sellers to generate its own revenue. Such conduct reflects an active role in the operation of the platform rather than that of intermediary. Despite this active involvement, the company seeks to evade liability by shifting the entire responsibility to the sellers.
- xv. The platform prominently advertises itself as having "50 Lakh+ Verified Buyers" and actively promotes services aimed at assisting buyers in procurement. Having represented itself as a platform serving buyers, the company cannot subsequently deny the existence of a consumer relationship solely to avoid its statutory obligations under the Consumer Protection Act. Further, the platform actively facilitates buyer-seller engagement through features such as "Tell Us Your Requirement & Get Best Quotes!", demonstrating that its role extends beyond merely hosting information.
- xvi. The investigation revealed that the platform cannot be regarded as an exclusive B2B marketplace, as it allows individual consumers to access listings and interact with sellers without verifying their business status. During buyer registration, neither a GST

number nor proof of business identity is required and even the "Company Name" field is optional. Registration requires only a phone number and an email address, after which any user can contact sellers directly.

- xvii. Furthermore, it has updated grievance officer contact details only after issuance of the Show Cause Notice (SCN), indicating prior non-compliance or inadequate disclosure practices which require examination. The overall investigation indicates that the company's primary focus appears to be on promotion of its membership services rather than ensuring transparency, accountability and consumer protection.
- xviii. Exporters India Limited is in violation of Sections 2(9), 2(28) and 2(47) of the Consumer Protection Act, 2019, as it facilitated the listing and sale of Ammonium Nitrate and Pentaerythritol Tetranitrate (PETN) without disclosing material information and legal restrictions governing its possession, purchase and use. Such concealment exposed consumers to legal and safety risks, impaired their ability to make informed decisions, constituting misleading advertisement and amounted to an unfair trade practice.
- xix. The company is further in violation of Section 6A read with Sections 9B and 9C of the Explosives Act, 1884, by facilitating the listing and sale of Ammonium Nitrate without ensuring that transactions were restricted to duly authorised and licensed persons as required under the applicable regulatory framework.
- xx. The company has failed to ensure compliance with Rule 4 and Rule 6(6) of the Ammonium Nitrate Rules, 2012, by hosting listings of a regulated substance without verifying the requisite PESO licence for lawful sale, distribution and possession and without implementing adequate mechanisms to ensure that Ammonium Nitrate is delivered only to eligible licence holders or procured from duly authorised persons.
- xxi. Additionally, it has failed to exercise due diligence in ensuring compliance with Notification No. S.O. 1678(E) dated 21 July 2011, issued by the Central Government under Section 17 of the Explosives Act, 1884, whereby Ammonium Nitrate has been expressly declared to be an 'explosive'. By facilitating the listing and availability of such a regulated substance without implementing adequate safeguards, licensing verification and compliance mechanisms, the company has demonstrated systemic compliance failures, thereby undermining the regulatory controls intended to protect public safety and national security.
- xxii. The company's conduct demonstrates a lack of due diligence expected from a marketplace e-commerce entity and is in violation of Rule 5 of the Consumer Protection (E-Commerce) Rules, 2020, as it failed to ensure that no unfair trade practice was

adopted on its platform and did not ensure provision of accurate and complete disclosures, thereby resulting in failure to enable informed consumer decision-making in respect of a regulated product.

- xxiii. In view of the above, as per the investigation conducted, a case relating to the violations under the Consumer Protection Act, 2019 and the above-mentioned statutes stands established.

11. Thereafter, the investigation report was shared with the opposite party on 21st August, 2026 and afforded an opportunity to file written comments thereon, along with a hearing.

12. The opposite party submitted its reply dated 5th September, 2026 in response to the Investigation Report wherein it made the following submissions:

- i. That there is no legal entity named "Exporters India Limited"; the correct and only entity concerned is Weblink.In Private Limited and no liability can be mechanically fastened without the correct entity being formally arrayed on record.
- ii. That Ammonium Nitrate, PETN and Picric Acid are exclusively high-risk B2B industrial inputs and not "consumer goods" within the meaning of Section 2(9) of the Act, that the platform is a non-transactional B2B search directory and that the CCPA accordingly lacks jurisdiction; that licensing and enforcement under the Explosives Act, 1884 and the Ammonium Nitrate Rules, 2012 fall within the exclusive domain of PESO and other sectoral authorities.
- iii. That the present case is distinguishable from *Dial4Trade Technologies Private Limited* (CCPA Order dated 1st September, 2026), inasmuch as Dial4Trade permitted purchase in quantities as low as a single unit, without any minimum-order condition and displayed sensational imagery depicting explosions, whereas the enquiries recorded on the opposite party's platform were for substantial industrial-grade quantities (for instance, 1200 Metric Tons and 5000 Tons of Ammonium Nitrate), with no such imagery and no completed retail consumer transaction has been identified.
- iv. That the Hon'ble National Consumer Disputes Redressal Commission (NCDRC) has, in *Meta Platforms Inc. v. CCPA* (Appeal No. NC/CCPAA/8/2026, order dated 6th May, 2026) and *Infocom Network Private Limited (Tradeindia.com) v. CCPA* (CCPAA No. 8 of 2026, order dated 11th May, 2026), stayed coercive action against digital B2B directories, recognising the distinction between a non-transactional B2B informational directory and a retail selling e-commerce platform.

- v. That the obligation of an intermediary to remove or disable access to third-party content is triggered only upon “actual knowledge” by way of a court order or a direct notification from a competent government authority, per *Shreya Singhal v. Union of India*, (2015) 5 SCC 1; that no such notice was received prior to the Show Cause Notice; that the listings were removed immediately upon receipt of the Show Cause Notice; and that the opposite party’s Apache Solr-based restricted-keyword blacklisting engine already existed prior to the Show Cause Notice. Respondent upgraded its Apache Solr-based restricted-keyword blacklisting engine into which the specific terms “Ammonium Nitrate”, “Pentaerythritol Tetranitrate”, “PETN” and “Picric Acid”, together with synonyms and CAS numbers, were incorporated.
- vi. That the fees charged by the opposite party are flat membership/subscription fees (for search visibility, website-template hosting and SEO optimisation) and not transaction-linked commissions and that the opposite party neither issues invoices nor receives any consideration linked to transactions concluded between users; and that the Orders of this Authority against Amazon (Ayodhya Prasad) and Flipkart (Toys QCO) are distinguishable as those platforms earned commissions directly tied to individual product sales and controlled the transaction flow and delivery logistics.
- vii. That the in-platform chat and buyer-enquiry dashboard are communication tools only, with no add-to-cart, checkout, payment-gateway, escrow or shipping/order-fulfilment functionality and do not, by themselves, establish that the opposite party participates in, facilitates or controls the underlying commercial transaction.
- viii. That the 'V-Trust Certificate' is a limited business/document verification service, confirming only specified particulars such as GSTIN, registration and business address and expressly disclaims that it amounts to verification of the legality of any product listed, or of any sector-specific licence including a PESO licence.
- ix. That the optional nature of the "Company Name" field at buyer registration accommodates sole proprietors and small-scale traders and does not, by itself, convert the platform into a retail consumer marketplace; and that the actual enquiries on record are all for bulk/industrial quantities.
- x. That, without prejudice to the foregoing and without admission of liability, the opposite party has undertaken voluntary remedial measures, namely: immediate takedown of the impugned listings; expansion of the Apache Solr-based restricted-keyword repository to approximately 500 additional high-risk terms; introduction of a seller-verification undertaking with a HOLD mechanism for licence-controlled categories pending verification; a risk-based listing-classification framework (HARD BLOCK/MANUAL

REVIEW/ALLOW), with an SOP placed on record as Document No. 1; active onboarding on the Government of India's Sahyog Portal (MHA/I4C) for notice-and-takedown cooperation under Section 79(3)(b) of the Information Technology Act, 2000; proposed safety-warning disclaimers on search/category result pages; and a request that CCPA and other competent departments furnish a consolidated, authoritative list of restricted chemical identifiers for integration into its screening systems.

- xi. The opposite party accordingly prayed that the Show Cause Notice be withdrawn, the findings of the Investigation Report be dismissed and that it be discharged from the present proceedings.
13. The CCPA conducted a hearing on 7th September, 2026, wherein Mr. Sukrit R. Kapoor, Mr. Vijay Shankar V.L. and Mr. Ashmit Dhawan, Advocates appeared on behalf of the opposite party and made the following submissions:-
- i. That the opposite party's platform is, in substance, akin to a 'directory' or 'yellow pages', where a seller merely furnishes contact details for others to view; that no invoice is generated and no transaction is concluded on the platform itself; that any transaction, if it takes place at all, occurs entirely offline; and that the opposite party has no knowledge whether any transaction is, in fact, ever concluded between the parties who connect through its platform.
 - ii. That Section 6A of the Explosives Act, 1884 is titled "prohibition of manufacture, possession, sale or transport of explosives by young persons and certain other persons" and that the opposite party has neither manufactured, possessed, sold nor transported Ammonium Nitrate or PETN and does not fall within the class of persons prohibited under the said provision; and that Section 6B, pertaining to the grant of licences, is directed at persons seeking to manufacture explosives, which the opposite party does not undertake.
 - iii. That, by way of comparison, Section 13 of the Insecticides Act, 1968 expressly extends to any person who desires to "manufacture, sell, stock or exhibit for sale" any insecticide and Rule 10E of the Insecticides Rules, 1971 expressly obliges an e-commerce entity, before permitting the online sale of insecticides, to verify the validity of the concerned licensee's licence; that no comparable provision exists under the Explosives Act, 1884, the Explosive Substances Act, 1908, or the Ammonium Nitrate Rules, 2012, casting an equivalent obligation upon an e-commerce entity to verify sellers' licences; and that, in the absence of such an express statutory obligation, the

- Investigation Report's finding that the opposite party failed to put in place sufficient mechanisms to verify sellers is, according to the opposite party, not sustainable in law.
- iv. That the opposite party has, in any event, discharged its obligations under Section 79(3)(b) of the Information Technology Act, 2000 by promptly disabling access to the impugned listings immediately, i.e. "the very next day or the day after", upon receiving notification, that it has not "vitiating any evidence" and has been fully transparent in disclosing all listings on its platform and that, per paragraph 122 of *Shreya Singhal v. Union of India*, (2015) 5 SCC 1, an intermediary's obligation to remove content arises only upon actual knowledge through a court order or government notification and cannot be equated with an obligation to pre-emptively assess the legality of every listing on a platform of its scale.
 - v. That approximately 50 or more listings, some dating back several years, were identified and have since been taken down in their entirety and that no product of the description in issue presently remains accessible on the opposite party's platform.
 - vi. That the opposite party has not initiated and does not consider itself competent to initiate, any legal or regulatory action (such as a police complaint) against the sellers who listed the impugned products, on the ground that it is not itself a regulator, but that it has blacklisted the entire product category of Ammonium Nitrate, PETN and Picric Acid, together with associated synonyms and chemical formulations at the keyword level, so that no such product can be listed on its platform again, as more particularly described in the risk-based classification framework and SOP (Document No. 1) filed with its written reply.
 - vii. That the opposite party does not charge any fee for an ordinary listing (illustrated with reference to a listing made by an entity described as 'Khan Study Group', for which no payment is charged) and derives revenue predominantly from optional membership/promotional plans ranging, on instructions, from approximately Rs. 10,000-15,000 to higher amounts for a defined time period which merely afford a paying seller's listing greater visibility or precedence in search results and are not tied to the sale of any specific product or category of product.
 - viii. That, without prejudice to its legal submissions, the opposite party's counsel placed on record an oral assurance and undertaking that Weblink.In Private Limited assures the Authority that none of the products in question Ammonium Nitrate, PETN or Picric Acid will ever be traded or listed on its platform in future.

14. It is important to note that at the outset, on the objection regarding misdescription of the opposite party, the CCPA notes that the platform ExportersIndia.com, which is the subject-matter of the present proceedings, is admittedly owned, operated and managed solely by Weblink.In Private Limited which has throughout these proceedings responded to the Show Cause Notice, participated in the investigation and filed its written reply and made oral submissions through counsel at the hearing without any demonstrated prejudice on account of the description used in the Show Cause Notice. The Authority accordingly directs that the cause title and records of the present proceedings be corrected to reflect Weblink.In Private Limited (trading as ExportersIndia.com) as the opposite party and proceeds to determine the matter on merits.

15. Section 2(1) of the Act defines "advertisement" to mean "any audio or visual publicity, representation, endorsement or pronouncement made by means of light, sound, smoke, gas, print, electronic media, internet or website and includes any notice, circular, label, wrapper, invoice or such other documents." The definition is wide and technology-neutral and expressly extends to publicity or representation made through "electronic media, internet or website," without confining the term to conventional print or broadcast media. The impugned listings of Ammonium Nitrate and PETN, hosted on the opposite party's e-commerce platform and accessible over the internet, comprising product descriptions including, as demonstrated during the hearing, a description of PETN as being usable in "high explosive" together with a facility to contact the seller and negotiate the transaction, constitute a "visual publicity" and "representation" made by means of "electronic media, internet or website" within the meaning of Section 2(1) of the Act and accordingly qualify as an "advertisement" thereunder. The opposite party, by hosting, displaying and disseminating such listings on its platform, is the medium through which the advertisement was published and made available to consumers.

16. The opposite party's main contention is that it is a non-transactional B2B search/directory platform akin to a 'yellow pages', dealing exclusively in industrial-grade, high-risk chemicals meant for authorized business use and is therefore outside the ambit of the Act and the Consumer Protection (E-Commerce) Rules, 2020. This contention cannot be accepted, as explained in the following paragraphs.

17. At the outset, it may be noted that the opposite party's platform is not being operated "for any public good" in the manner of a public utility; it derives a direct commercial benefit from the engagement generated on it, as is borne out by its own admissions regarding its

membership and verification-fee structure, discussed further below. On the opposite party's own logic that it bears no responsibility for listings uploaded by third parties, of which it disclaims all knowledge a platform could equally disclaim responsibility if licensed firearms, licensed narcotics or other unlawful items are to be listed by third-party users; such a proposition cannot be allowed in respect of a platform that is not a mere passive conduit but an organized commercial venture bringing together buyers and sellers of a statutorily regulated and hazardous commodity. Nor does it assist the opposite party to say that, unlike narcotics, Ammonium Nitrate and PETN may lawfully be dealt with by licensed persons; it is precisely this licensing and eligibility gate-keeping that the opposite party's platform failed to enforce, since permitting a regulated substance to be dealt with by licensed persons alone presupposes verification of such licence, which the opposite party has admittedly never undertaken. It may also be clarified that the case against the opposite party is not that it has itself manufactured, sold or otherwise dealt in Ammonium Nitrate or PETN, but that it failed to ensure that users of its platform were informed of the highly regulated character of these substances and of the licensing requirements attaching to their lawful purchase and possession safeguards that would ordinarily attend any physical-world transaction in such substances but which, on the opposite party's own showing, found no counterpart on its platform.

18. In this connection, the Delhi High Court, in *Christian Louboutin SAS v. Nakul Bajaj & Ors.*, 2018 SCC OnLine Del 12215, examining the liability of an e-commerce platform claiming intermediary status, held that an online marketplace ceases to be a passive intermediary and becomes an active participant where it renders services beyond mere hosting including charging subscription/membership fees, actively promoting sellers' listings and offering verification or authentication services that lend credibility to a seller in the eyes of a buyer and that such active participation disentitles the platform to safe-harbour protection under Section 79 of the Information Technology Act, 2000. This principle applies with full force to the facts of the present case and is examined further below in the context of the opposite party's revenue model, its V-Trust Certificate and its in-platform buyer-seller engagement features.

19. It is important to note that the record including the material as depicted in the annexures/screenshots annexed with the Show Cause Notice does not bear out the opposite party's characterization of itself as an exclusive B2B marketplace dealing only in bulk quantities. Buyer registration on the platform requires only a phone number and an e-mail address; the "Company Name" field is optional and no GSTIN, business licence or other proof

of business identity is verified before a user is permitted to browse listings and contact sellers directly. The platform is, further, actively promoted to buyers generally, advertising "50 Lakh+ Verified Buyers" and inviting any visitor to "Tell Us Your Requirement & Get Best Quotes!". More tellingly, the opposite party's own platform, as depicted in the annexures/screenshots annexed with the Show Cause Notice, permitted a user to submit a 'requirement' for Ammonium Nitrate or PETN in any quantity, with no minimum-order threshold, and one such annexed screenshot depicted a listing for PETN priced on a per-kilogram basis with a 'Get Price Quote' option directly at odds with the opposite party's submission that only bulk, industrial-scale enquiries are transacted on its platform. A platform that holds itself out in this manner and does not verify the business status of the persons accessing it, cannot resist regulatory scrutiny by unilaterally re-characterizing its own user base and product access as exclusively institutional and bulk in nature.

20. Even assuming the platform to be a genuine B2B marketplace, this would not, by itself, take it outside the ambit of the Act or the Consumer Protection (E-Commerce) Rules, 2020. The definition of 'e-commerce entity' under the said Rules is not confined to platforms dealing with retail consumers alone and Rule 4(3) and Rule 5 thereof cast obligations upon every marketplace e-commerce entity, without any exception carved out for platforms that self-designate their transactions as business-to-business more so where, as here, the goods concerned are statutorily regulated explosive substances. Section 2(9) of the Act, similarly, protects against the marketing of goods hazardous to life and property and is not confined in its application to household consumer goods.

21. The opposite party cannot absolve itself of responsibility merely on the ground that the impugned listings were uploaded by independent third-party sellers, or on the ground that it functions as a mere 'directory' with no knowledge of whether any transaction is concluded. The opposite party's own submissions establish that it possesses full technical and administrative control over the content hosted on its platform including the ability to review, restrict and remove listings, disable seller accounts and implement keyword-level blocking and it cannot, in the same breath, contend that responsibility for regulatory compliance rests exclusively with third-party sellers and buyers transacting 'offline'.

22. The CCPA finds considerable force in the Investigation Report's findings, as confirmed and elaborated upon during the hearing, that the opposite party's revenue model and platform features are inconsistent with the posture of a passive intermediary and consistent instead with the indicia of active participation discussed in *Christian Louboutin (supra)*. The opposite party has itself confirmed, on instructions taken during the hearing, that it charges membership/subscription fees ranging from approximately Rs. 10,000-15,000 to higher amounts, for a defined period, to sellers seeking greater visibility or precedence for their listings; it offers a paid 'V-Trust Certificate' held out to instil buyer confidence in a seller; and it enables real-time, in-platform negotiation between buyers and sellers through a chat and enquiry-dashboard facility. These features, taken together, demonstrate that the opposite party actively promotes commercial engagement on its platform and derives a direct commercial benefit from doing so; a platform that markets itself in this manner to both buyers and sellers and profits from increased engagement between them, cannot simultaneously disclaim any responsibility for the character of the listings it hosts and profits from.

23. Rule 3 of the Consumer Protection (E-Commerce) Rules, 2020 defines a 'marketplace e-commerce entity' as an e-commerce entity which provides an information technology platform on a digital or electronic network to facilitate transactions between buyers and sellers. Having regard to the opposite party's own admissions that it provides a digital platform enabling sellers to list products and buyers to discover and contact them, that it charges fees for enhanced visibility, that it verifies and displays a 'trust' indicator against sellers and that it enables in-platform negotiation between buyers and sellers. The CCPA holds that the opposite party squarely answers this description and is a 'marketplace e-commerce entity' within the meaning of the said Rules, regardless of its own preferred characterization of itself as a mere 'directory' or 'B2B information platform'. The obligations under Rule 4(3) and Rule 5 of the said Rules, discussed further below, therefore apply directly to the opposite party.

24. The CCPA is unable to accept the submission that the industrial or bulk quantity of the enquiries recorded on the platform such as 1200 Metric Tons or 5000 Tons of Ammonium Nitrate takes the matter outside the domain of the Act, or distinguishes it favourably from *Dial4Trade Technologies Private Limited (supra)*. This submission is, in any event, contradicted by the opposite party's own platform, which, as depicted in the annexures/screenshots annexed with the Show Cause Notice, permitted a user to submit an enquiry for any quantity without a minimum-order threshold and hosted a retail-accessible, per-kilogram listing for PETN, as evidenced by the said annexures. In any event, the diversion,

without verification of license or eligibility, of explosive precursors in industrial-scale quantities to unverified counterparties presents a graver, not a lesser, risk to public safety and national security than a retail-quantity transaction; the statutory safeguards under the Ammonium Nitrate Rules, 2012 and the Explosives Act, 1884 apply with full force irrespective of the quantity involved and the absence of any seller-licence or buyer-eligibility verification in respect of either bulk or retail-quantity enquiries is a serious aggravating feature of the present case.

25. It may also be noted that courts have, in analogous contexts, taken a strict view of the online availability of substances whose sale is subject to licensing or regulatory control, where adequate verification safeguards are absent. The Delhi High Court, in *Dr. Zaheer Ahmed v. Union of India & Ors.*, W.P.(C) 11711/2018, by an interim order dated 12th December, 2018 (Division Bench of Chief Justice Rajendra Menon and Justice V. Kameswar Rao), restrained the sale of drugs online without a valid licence, taking note of the risk posed by unregulated and unverified access to substances requiring licensed sale. While those proceedings concerned pharmaceutical products, the underlying rationale that the mere convenience of online access cannot be permitted to dilute the licensing and verification safeguards that apply to the sale of a regulated substance in the physical marketplace applies with equal, if not greater, force to explosive substances such as Ammonium Nitrate and PETN, having regard to the graver and more immediate risk to public safety and national security that unverified access to such substances entails.

26. The CCPA finds that the opposite party's own "verified" (green tick) indicator against seller listings constitutes an independent and freestanding instance of misleading representation. As admitted by the opposite party during the hearing, the tick denotes nothing more than confirmation of a seller's mobile number and where a further indicator suggests GST registration, denotes nothing more than that the seller has self-furnished a GSTIN, without any independent verification thereof; the tick does not extend to verification of business identity, licensing, or legal eligibility to deal in Ammonium Nitrate or PETN. A prospective buyer viewing such a "verified" tick against a seller of a regulated explosive substance would reasonably and wrongly, infer some degree of vetting of that seller's credentials or legal compliance, when none beyond a mobile number in fact exists. This is, by itself, a representation likely to mislead consumers as to the nature and reliability of the sellers listed on the opposite party's platform, within the meaning of Section 2(28)(ii) of the Act and an unfair and deceptive practice within the meaning of Section 2(47) of the Act.

27. The presence of Pentaerythritol Tetranitrate (PETN) among the substances listed on the opposite party's platform, including in the listing depicted in the annexures/screenshots annexed with the CCPA's Notice describing the product as usable in "high explosive" and as an "explosive core for detonating fuse", is a matter of particular concern. PETN is not an ordinary regulated chemical but a 'special category explosive substance' under the Explosive Substances Act, 1908, with a well-documented potential for use in improvised explosive devices; its unverified, per-kilogram availability for enquiry and purchase on a commercial platform, without any licence or eligibility check, is a significantly more serious lapse than would arise in respect of a less sensitive substance and materially aggravates the opposite party's culpability in the present case.

28. The heightened responsibility attaching to any person or entity facilitating access to inherently hazardous substances finds support in the well-settled principle enunciated by the Hon'ble Supreme Court in *M.C. Mehta v. Union of India*, (1987) 1 SCC 395 (the Oleum Gas Leak case), where the Court held that an enterprise engaged in a hazardous or inherently dangerous activity owes an absolute and non-delegable duty to the community to ensure that no harm results on account of such activity and that this obligation cannot be diluted merely because the enterprise claims to have exercised reasonable care. While that case arose in the context of tortious liability for industrial hazards, the underlying principle that those who deal in, or facilitate access to, inherently dangerous substances bear a heightened, non-delegable duty of care commensurate with the risk involved is instructive in assessing the standard of due diligence expected of the opposite party in permitting the listing of Ammonium Nitrate and, more particularly, PETN on its platform.

29. The opposite party's reliance on the intermediary liability exemption under Section 79 of the Information Technology Act, 2000, on *Shreya Singhal v. Union of India*, (2015) 5 SCC 1 and on the comparative absence of a provision similar to Rule 10E of the Insecticides Rules, 1971 under the Explosives Act, 1884 or the Ammonium Nitrate Rules, 2012, is misplaced. The safe harbour under Section 79 is conditional upon compliance with the due diligence obligations prescribed under Section 79(2), including the general due-diligence obligation under Section 79(2)(c) and Rule 3(1)(b) of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, which independently obligates every intermediary to exercise due diligence to ensure that unlawful information, including the listing

of goods whose sale is restricted or prohibited under applicable law, is not hosted, displayed, uploaded or published on its platform.

30. The 'actual knowledge' standard in *Shreya Singhal* governs an intermediary's obligation to take down specific content upon notification; it does not exempt an intermediary from the independent, ongoing obligation of due diligence at the point of listing. Nor can the absence, under the Explosives Act, 1884 and the Ammonium Nitrate Rules, 2012, of a provision in terms identical to Rule 10E of the Insecticides Rules, 1971 be read as a legislative intention to exempt e-commerce platforms dealing in explosive substances from the general due-diligence obligations that independently arise under Rule 3(1)(b) of the IT Rules, 2021 and Rules 4(3) and 5 of the Consumer Protection (E-Commerce) Rules, 2020; a validly notified and gazetted law, such as Notification No. S.O. 1678(E) dated 21st July, 2011 and the Ammonium Nitrate Rules, 2012, is presumed to be known to all persons governed by it and the opposite party's own admission, at the hearing, that it undertakes no verification whatsoever of a seller's licence leaving this entirely to the seller and buyer demonstrates that no meaningful due diligence was, in fact, applied to listings of these substances at any stage prior to the Show Cause Notice.

31. It may be noted that the two orders of the Hon'ble NCDRC relied upon by the opposite party *Meta Platforms Inc. v. CCPA* (Appeal No. NC/CCPAA/8/2026) and *Infocom Network Private Limited (Tradeindia.com) v. CCPA* (CCPAA No. 8 of 2026) are, on the opposite party's own showing, orders staying coercive steps and/or admitting appeals pending final adjudication. They are interim orders and do not constitute final determinations on merits of the question whether a B2B digital directory is, in all circumstances, outside the scope of the Act or the Consumer Protection (E-Commerce) Rules, 2020. Each such matter necessarily turns on its own facts and record and the said orders do not have the effect of foreclosing an independent determination by this Authority on the facts of the present case. It may also be clarified that, although the sector-wide review referred to in paragraphs above revealed that several e-commerce entities were permitting similar listings, the present proceedings are confined to the opposite party alone on the basis of the specific record before the Authority in this case; the fact that other platforms may also warrant scrutiny does not, in itself, furnish any defence to the opposite party, nor does it detract from the findings recorded against it herein and this Order is without prejudice to such independent action as the CCPA may take against other e-commerce entities on the basis of their own conduct and record.

32. Further, the delay and non-cooperation on the part of the opposite party before the DG (Investigation)/ADG (Investigation) where, despite a notice dated 15th June, 2026, a follow-up email dated 24th June, 2026, a final reminder dated 1st July, 2026 and repeated calls, emails and a Speed Post letter dated 23rd July, 2026, no substantive response was furnished for over a month, until 31st July and 3rd August, 2026 reflects poorly on the opposite party's claimed bona fides and its stated commitment to regulatory cooperation, notwithstanding its explanation that the relevant communications were routed to a spam folder. This is compounded by the opposite party's admission at the hearing that it has taken no legal or regulatory action of any kind against any of the approximately 50 or more sellers found to have listed Ammonium Nitrate or PETN on its platform, relying instead solely on prospective keyword-blacklisting, which does nothing to address the conduct of sellers already identified.

33. The CCPA notes the opposite party's admission, at the hearing, that it was unable to explain what due diligence, if any, was undertaken in respect of sellers based outside India including sellers from Nigeria, Bangladesh, Bhutan, Ghana, Jordan and Kenya found listed on its platform prior to the implementation of its post-notice screening mechanism. The absence of any verification even of domestic sellers' business identity or licensing status, let alone of cross-border sellers of a substance with export-control and national-security sensitivity, is a further serious deficiency in the opposite party's due-diligence framework as it stood at the relevant time.

34. Section 2(28) of the Act defines "misleading advertisement", in relation to any product or service, to mean an advertisement which

- i. falsely describes such product;
- ii. gives a false guarantee or is likely to mislead consumers as to the nature, substance, quantity or quality of the product;
- iii. conveys an express or implied representation which, if made by the seller, would constitute an unfair trade practice; or
- iv. deliberately conceals important information.

35. The impugned listings advertised Ammonium Nitrate and PETN for commercial enquiry and purchase including, as found at the hearing, at retail-accessible, per-kilogram pricing without disclosing that their lawful acquisition is subject to a valid PESO licence, or that unauthorised possession may attract penal consequences, while simultaneously displaying a "verified" tick against the seller that, in fact, verifies nothing beyond a mobile number,

thereby creating the false impression that these substances were freely, safely and lawfully available for procurement by any visitor to the platform from a vetted seller. This amounts to deliberate concealment of important information within sub-clause (iv) of Section 2(28), a false or misleading guarantee within sub-clause (ii) and, since such a representation, if made directly by a seller, would itself constitute an unfair trade practice, also falls within sub-clause (iii). Accordingly, the impugned listings constitute 'misleading advertisement' within the meaning of Section 2(28) of the Act.

36. Section 2(47) of the Act defines 'unfair trade practice' as a trade practice which, for the purpose of promoting the sale, use or supply of any goods, adopts any unfair method or unfair or deceptive practice. The hosting and facilitation, by the opposite party, of the availability of substances whose sale is statutorily restricted to licensed and verified persons, on terms indistinguishable from an ordinary commercial listing, accompanied by a deceptive "verified" indicator and without the verification, traceability or disclosure safeguards required by law, while simultaneously deriving commercial benefit through membership fees and value-added services such as the V-Trust Certificate, constitutes an unfair and deceptive practice within the meaning of Section 2(47) of the Act.

37. Rule 4(3) of the Consumer Protection (E-Commerce) Rules, 2020 provides that no e-commerce entity shall adopt any unfair trade practice in the course of its business, whether on its platform or otherwise; Rule 5 requires a marketplace e-commerce entity to ensure that sellers provide accurate descriptions of goods and all relevant information necessary for consumers to make informed decisions, including disclosures relating to the legal status of goods offered. For the reasons discussed above, the opposite party has failed to comply with Rule 4(3) and Rule 5 of the said Rules.

38. The CCPA clarifies that the licensing, enforcement and penal provisions under the Explosives Act, 1884, the Explosive Substances Act, 1908 and the rules made thereunder fall within the jurisdiction of PESO and other competent authorities and the present Order does not record or determine any criminal liability thereunder, nor any liability of the opposite party under Section 6A of the Explosives Act, 1884 (which, on its terms, addresses persons undertaking manufacture, possession, sale or transport of explosives). These provisions are, however, relevant to the present proceedings inasmuch as they establish the legal restrictions applicable to Ammonium Nitrate and PETN and, consequently, the information material to consumers under Section 2(28) of the Act and the safeguards required to be considered by the

opposite party while permitting the listing of such regulated substances, in the context of Section 2(47) of the Act and Rules 4(3) and 5 of the Consumer Protection (E-Commerce) Rules, 2020.

39. In view of the foregoing analysis, the CCPA finds that the opposite party has violated the following provisions:

- i. Section 2(9) of the Consumer Protection Act, 2019: by facilitating the marketing of goods hazardous to life and property.
- ii. Section 2(28) of the Consumer Protection Act, 2019: misleading advertisement, inasmuch as the listings concealed material information regarding licensing, buyer eligibility and lawful usage conditions and displayed a deceptive "verified" indicator against sellers and were likely to mislead consumers as to the legality, safety and permissible use of the products.
- iii. Section 2(47) of the Consumer Protection Act, 2019: unfair trade practice, inasmuch as the opposite party adopted a deceptive practice by hosting and facilitating the availability of regulated explosive substances, at both bulk and retail-accessible quantities, without the regulatory safeguards mandated by law, while deriving commercial benefit through paid membership and verification services. Rule 4(3) and Rule 5 of the Consumer Protection (E-Commerce) Rules, 2020.
- iv. The aforesaid provisions of the Consumer Protection Act, 2019 and the Consumer Protection (E-Commerce) Rules, 2020, read with Section 6A read with Sections 9B and 9C of the Explosives Act, 1884 and Rule 4 and Rule 6(6) of the Ammonium Nitrate Rules, 2012, insofar as the latter provisions bear upon the materiality of the concealed information and the adequacy of the safeguards required, as discussed above; it is clarified that this Order does not record or determine any liability under the Explosives Act, 1884, the Explosive Substances Act, 1908, or the rules made thereunder, which falls within the jurisdiction of the competent authorities under those laws.

40. The CCPA is empowered under Section 21 of the Act to issue directions to the advertiser of a false or misleading advertisement to discontinue or modify the advertisement and, if necessary, to impose by order a penalty which may extend to ten lakh rupees and, for every subsequent contravention, to a penalty which may extend to fifty lakh rupees. Section 21(7) of the Act requires the Authority, while determining such penalty, to have regard to

- i. the population and area impacted or affected by such offence;
- ii. the frequency and duration of such offence; and

iii. the vulnerability of the class of persons likely to be adversely affected by such offence.

41. The CCPA notes that this is the first proceeding of its kind against the opposite party before it, within the meaning of Section 21 of the Act. At the same time, the Authority takes serious note of the following aggravating factors:

- i. The present matter involves not one but two regulated explosive substances, Ammonium Nitrate and PETN, the latter being a 'special category explosive substance' with a documented history of misuse in improvised explosive devices, placing the present violation in a materially graver category than an ordinary misleading advertisement;
- ii. Contrary to the opposite party's submission that its platform dealt only in bulk, industrial-scale quantities, the opposite party's own platform, as demonstrated at the hearing, permitted enquiries for any quantity with no minimum-order threshold and hosted a live, retail-accessible, per-kilogram listing for PETN at the time of the hearing itself, well after issuance of the Show Cause Notice and the Investigation Report;
- iii. The opposite party's "verified" (green tick) indicator against sellers, shown to denote nothing more than mobile-number confirmation, creates a false impression of vetting for buyers of a hazardous regulated substance;
- iv. The opposite party did not extend timely cooperation to the Investigation Wing, having failed to respond to communications dated 15th June, 24th June and 1st July, 2026 and having furnished a substantive response only after a Speed Post letter dated 23rd July, 2026 and repeated follow-up;
- v. The opposite party has, on its own admission at the hearing, taken no legal or regulatory action of any kind against any of the approximately 50 or more sellers found to have listed Ammonium Nitrate or PETN on its platform;
- vi. The opposite party was unable to demonstrate any due diligence undertaken in respect of cross-border sellers, including from Nigeria, Bangladesh, Bhutan, Ghana, Jordan and Kenya, listed on its platform;
- vii. The opposite party derives commercial benefit, through membership fees (admittedly ranging from approximately Rs. 10,000-15,000 to higher amounts) and its paid 'V-Trust Certificate' and other value-added services, from the very engagement and visibility that its inadequately-vetted listings generate, while simultaneously disclaiming any responsibility for the character of such listings;

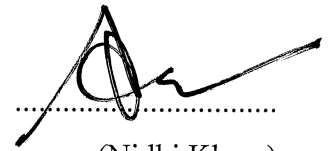
- viii. The impugned listings remained hosted and available on the platform up to and including May 2026 and it is not open to an e-commerce entity to await a notice from the CCPA before ensuring that goods regulated and restricted under the law of the land are not offered for sale, enquiry or facilitation on its platform, particularly where the regulatory framework governing such substances has been in force for well over a decade;
- ix. The opposite party's platform has been in operation since 1997 and it cannot, on this basis, be treated as a nascent or inexperienced entity unfamiliar with regulatory requirements, notwithstanding its submission that it is a "much smaller entity" than platforms such as Google, Facebook or Meta.

42. On the other hand, the CCPA also takes note, as mitigating factors, that: the opposite party took down the listings identified in the Show Cause Notice upon its receipt; a restricted-keyword screening mechanism was already in place prior to the Show Cause Notice, even though it did not, at the relevant time, extend to the specific terms in issue; the opposite party has since substantially expanded its restricted-product repository and proposed a risk-based listing-classification framework, with an SOP placed on record; the opposite party is onboarded on the Government of India's Sahyog Portal for notice-and-takedown cooperation; and, at the hearing, the opposite party's counsel placed on record an unconditional oral assurance and undertaking that none of the products in question will be listed or traded on its platform in future.

43. Having regard to the nature and gravity of the violations, the involvement of two regulated explosive substances including a special-category substance, the deceptive character of the opposite party's "verified" seller indicator, the vulnerability of the public at large to the risks arising from unregulated access to explosive precursors, the opposite party's delayed cooperation with the investigation and its failure to take any action against identified sellers and, on the other hand, the mitigating steps and the unconditional undertaking given by the opposite party as noted above. The opposite party is cautioned that, in the event of any subsequent contravention of a like nature, it shall be liable to an enhanced penalty of up to fifty lakh rupees under the proviso to Section 21(2) of the Act.

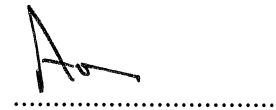
44. In view of the above, in exercise of powers under Sections 20 and 21 read with Section 10 of the Consumer Protection Act, 2019, the CCPA hereby issues the following directions:

- i. The opposite party, Weblink.In Private Limited (trading as ExportersIndia.com), shall immediately and permanently discontinue the listing, hosting, advertising, or facilitation of sale of or enquiry regarding Ammonium Nitrate, Pentaerythritol Tetranitrate (PETN), or of any other substance classified as an explosive or special category explosive substance under the Explosives Act, 1884 or the Explosive Substances Act, 1908, on its platform.
- ii. The opposite party is directed to pay a penalty of ₹ 10,00,000/- (Rupees Ten Lakhs) for the violations detailed in the foregoing paragraphs.
- iii. The opposite party shall submit a compliance report in respect of directions (i) to (ii) above within 15 days of receipt of this Order.



(Nidhi Khare)

Chief Commissioner



(Anupam Mishra)

Commissioner

Annexure- 1

exportersindia.com/search.php?srch_catg_ty=prod&term=ammonium+nitrate&cont=IN&ss_status=N

Welcome User! [Sign In](#) [Join Free](#) Sales: +91-9953717914 | Support: +91-9700318318

For Buyer For Seller Help

ExportersIndia.com
Largest Searchable B2B Marketplace

Products / Services: ammonium nitrate [Search](#)

[Post Buy Requirement](#)

Related Category

- Ammonium Nitrate
- Fertilizer
- Organic Fertilizer
- Sulfur Fertilizer
- Potassic Fertilizers

Business Type

- Manufacturer
- Exporter
- Wholesaler
- Retailer

UC Usha Chemotex
Panvel, Navi Mumbai, Maharashtra, India

DE Doopak Enterprises
Borivali West, Mumbai, Maharashtra, India

GM Ginnar Minerals Ltd. 
Shastri Nagar, Bhilwara, Rajasthan, India

L Lupin Pharmaceuticals Limited
Bandra East, Mumbai, Maharashtra, India

SI Surapi International Exporters
Mylapore, Chennai, Tamil Nadu, India

RF Ramesh Fertilizers 
Beach Road, Visakhapatnam, Andhra Pradesh, India

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Get Best Sellers for Ammonium Nitrate

Quantity: Unit:

Mobile Number:

[Submit Requirement](#)

To List your Product
Boost Your Business Visibility Worldwide
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Top Stories
BJP seeks campa...

Search

ENG IN 15:49 22-04-2026

Showing results for *ammonium nitrate* (146 Products / Services Available)
Search instead for [ammonium nitrate](#)

Filter by City [Near Me](#) [All India](#) [Mumbai](#) [Delhi](#) [Hyderabad](#) [Vadodara](#) [Pune](#) [Chennai](#) [Navi Mumbai](#) [Kolkata](#) [Coimbatore](#) [Thoothukudi](#) [Karur](#)

- Related Category
-  Ammonium Nitrate
 -  Fertilizer
 -  Organic Fertilizer
 -  Sulfur Fertilizer
 -  Potassic Fertilizers

- Business Type
- Manufacturer
 - Exporter
 - Wholesaler
 - Retailer

GLOBAL SELLER

Ammonium Ceric Nitrate, Brand Name : PPC, Grade : LR Grade
₹ 1,747 / kg

MOQ : 25 Kilogram
Shelf Life : 1 – 2 years (store properly)
Moisture Content : ≤ 1.0%
Color : Orange to reddish-orange
[More details...](#)

[View Mobile](#) [Send Inquiry](#)

PPC Powder Pack Chem
GST 

White Ammonium Nitrate, Packaging Type : Bags
[Get Price Quote](#)

MOQ : 100 Meter
Type : Fertilizer
Color : White
Packaging Type : Bags
[More details...](#)

[View Mobile](#) [Send Inquiry](#)

VG Vandya Global Private Limited  
GST 

Ammonium Ceric Nitrate 0.05 N Volumetric Solution (n/20)
₹ 555 / Litre

CAS No. : 16774-21-3
We are offering ammonium ceric nitrate 0.05 n volumetric solution (n20) normality 0.0495-0.0505 clear orange solution cas no: 16774-21-3
[More details...](#)

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Alpha Chemika  
GST 

Ammonium Nitrate, Packaging Type : HDPE Bags, Purity : 99%
[Get Price Quote](#)

MOQ : 100 Kilogram
Molar Mass : 80.043 g/mol
Density : 1.72 g/cm³
Country of Origin : India
[More details...](#)

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Chemford International  
GST 

Get Best Sellers for Ammonium Nitrate

Quantity Unit

Mobile Number

[Submit Requirement](#)

To List your Product
Boost Your Business Visibility Worldwide

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Related Category

-  Ammonium Nitrate
-  Fertilizer
-  Organic Fertilizer
-  Sulfur Fertilizer
-  Potassic Fertilizers

Business Type

- [Manufacturer](#)
- [Exporter](#)
- [Wholesaler](#)
- [Retailer](#)

Post your Buy Requirement

Get Quotes from Verified Suppliers

Save Your Time

Product & Services

Quantity

Unit

Mobile Number

[Get Quotes Now](#)



Ammonium Nitrate, Purity : 99.5%

[Get Price Quote](#)

Place of Origin : South Korea

Packaging Details : 1 MT JUMBO BAGS / 25 K...

Purity : 99.5%

Grade Standard : QUARRY GRADE / MINE GRA...

[More details...](#)

[View Mobile](#)

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Cure Chem India

Vasant Kunj, Delhi, India



Ammonium Cerate Nitrate, Purity : 99%

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Chloride (Cl) Cont... 0.001 %

CAS Number : 16774-21-3

Usage/Application : Chemical Process Industry

Grade : AR Grade

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Samir Tech Chem Pvt. Ltd.

Makarpura, Vadodara, Gujarat, India



Ammonium Nitrate, Grade : Chemical Grade

₹ 60,000 - ₹ 80,000 / Metric Ton

Packaging Size : 25-50Kg

Grade : Chemical Grade

Packaging Type : HDPE Bags

State : Crystal

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Asafar Enterprise

Kanakapura Road, Bengaluru, Karnataka, India



Ceric Ammonium Nitrate, Grade : ACS Grade

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Ammonium Nitrate, Grade : Chemical Grade

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-  Sulfur Fertilizer
-  Potassic Fertilizers

Business Type

- Manufacturer
- Exporter
- Wholesaler
- Retailer

Ammonium Nitrate, Certification : ISO 9001:2008 Certified
₹ 338 - ₹ 483 / Metric Ton

MOQ : 100 Metric Ton
Certification : ISO 9001:2008 Certified
Grade : Chemical Grade
Packaging Size : 50-100Kg

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BMR Resources 
Hirakud, Sambalpur, Odisha, India

Ceric Ammonium Nitrate, Grade : Chemical Grade
₹ 550 - ₹ 1,000 / Kilogram

MOQ : 5 Kilogram
Grade : Chemical Grade
Purity : 100%
Solubility : In Water

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Mincomotsal 
GST Vinayaka Nagar, Bengaluru, Karnataka, India

Ammonium Nitrate Granules
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MOQ : 2 Metric Ton
Molecular Formul... 5Ca(NO3)2·NH4NO3·10H...
Chemical Name : Nitrogen Calcium Fertilizer, 5...
EINECS : 239-289-5

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HE Heya Enterprise 
Barpeta, Assam, India

Ammonium Nitrate, For Blasting
₹ 30 / Kilogram

MOQ : 16 Metric Ton
Application : Blasting

We are involved in offering excellent quality Ammonium Nitrate for mine blasting application. Buyers with respective explosive licenses can...

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DE Dharani Export-import Services (p) Ltd. 
Vvd Road, Thoothukudi, Tamil Nadu, India

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Product & Services

Calcium Ammonium Nitrate
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Capacity : 1,42,500 MTA

Calcium Ammonium Nitrate Narmada CAN granules are white in color and are free flowing

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Business Type

Manufacturer
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Deepak Ammonium Nitrate, Purity : 99%

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CAS No. :
Brand Name : Deepak
Number Of Flower : Ammonium Nitrate
Purity : 99%

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Laxmi Narasimha Enterprises

Alair, Nalgonda, Telangana, India



Ammonium Nitrate, Grade : Chemical Grade

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MOQ : 50 Kilogram
State : Granules
Molecular Weight : 80.04
Anti-caking Agent : 0.08%

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Arol Enterprises

Nikol, Ahmedabad, Gujarat, India



High Quality 99% Purity Fast Release Granular Can Nitrogen...

₹ 9,719.26 - ₹ 13,457.40 / Metric Ton

MOQ : 25 Metric Ton
Grade : Chemical Grade
EINECS No. : 231-984-1
Certification : ISO 9001:2008 Certified

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Power Magnet Trading Enterprise

Tilak Road,, Anantapur, Andhra Pradesh, India



Ammonium Nitrate, Packaging Size : 0-25Kg, 25-50Kg

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MOQ : 25 Kilogram
Grade : Chemical Grade
Packaging Size : 0-25Kg, 25-50Kg
Purity : 99%

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Shree Gokulam Chemical Industries

GST Chengalpattu, Chennai, Tamil Nadu, India



Lolomo Ammonium Nitrate Premium Quality, Certification ...

₹ 100 - ₹ 150 / kg



Liquid Urea Ammonium Nitrate, Color : Creamy

₹ 115 / Kilogram

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Ammonium Nitrate

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Foto Rex India

Chand Pole, Udaipur, Rajasthan, India



Ammonium Ceri Nitrate

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Article No. :01120, Molecular Formula : (NH4)2Ce(NO3)6, Molecular Weight:548.23, Appearance:A reddish -orange crystalline powder, Assay (after drying):Min 98.0%, Symbol...

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SO

SCIENTIFIC OEM

Masjid Bunder, Mumbai Maharashtra, India



Ammonium Ceri Nitrate

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We are a prominent Manufacturer and Exporter of Ammonium Ceri Nitrate from India. Our range of Ammonium Ceri Nitrate is formulated from quality base materials. The Ammonium Ceri...

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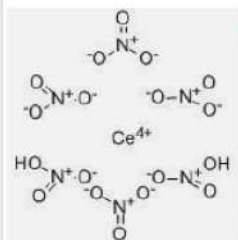
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Ki

Karolinska Industries

Kandivali, Mumbai, Maharashtra, India



Ammonium Ceri Nitrate

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Product Code:RE0100, Grade:Rare Earths, Assay : (after drying ex Ce) 98%, CAS:16774-21-3, Molecular Formula:(NH4)2[Ce(NO3)6], Molecular Weight:548.23, Packings :25 gm | 100 gm | 1 kg...

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CENTRAL DRUG HOUSE (P) LTD

Daryaganj, Delhi, India



Calcium Ammonium Nitrate

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Eltee Fertilizers is prominent name in the industry for its excellent quality fertilizers. We are



Ammonium Cerium Nitrate

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Ammonium Cerium Nitrate Owing to our rich industrial experience and knowledge, we are

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-  Potassic Fertilizers

Business Type

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☐ GST ☐ Santacruz East, Mumbai, Maharashtra, India

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PN **Peri Nitrates Private Limited**
Aundh, Pune, Maharashtra, India

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EI **EcoFusion Inc** ✓
Delhi, India

Ammonium Nitrate
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PN **Peri Nitrates Plv Ltd**
Pune, Maharashtra, India

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GM **Girnar Minerals Ltd.** ✓
Shastri Nagar, Bhilwara, Rajasthan, India

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RA **Rawmatimpex**
Kalyani Nagar, Pune, Maharashtra, India

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SI **sahithya import & export**
Huzurabad, Karimnagar, Telangana, India

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SF **SCIENTIFIC FERTILISER COMPANY PVT LTD**
R S Puram, Coimbatore, Tamil Nadu, India

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DE **Deepak Enterprises**
Borivali West, Mumbai, Maharashtra, India

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Ideal Industrial Explosives Ltd

OST Tar Bund, Secunderabad, Telangana, India



Pentaerythritol Tetranitrate (PETN)

₹ 350 - ₹ 450 / kg

Petr Pentaerythritol Tetranitrate that we are offering is a white colored crystallite material, which is independently used as a high explosive, as the explosive core for detonating fuse (or) as...

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Aamir Usmani Shaikh

Nagpur, Maharashtra, India



Pentaerythritol Tetranitrate

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A packet containing explosive material was recovered from the Uttar Pradesh Assembly, was later confirmed as Pentaerythritol Tetranitrate (PETN), one of the most dangerous plastic...

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Khan Study Group

Vijay Nagar, Delhi, India



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neo-plant agro

Sanand, Ahmedabad, Gujarat, India

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