Central Consumer Protection Authority
Room No. 545, Krishi Bhawan, New Delhi - 110001

Case No: CCPA-2/25/2022-CCPA

In the matter of: Case against Okinawa Autotech Pvt. Ltd. regarding regarding violation of consumer rights and unfair trade practices

CORAM:

Smt. Nidhi Khare, Chief Commissioner
Shri. Anupam Mishra, Commissioner

Appearance on behalf of Okinawa Autotech Pvt. Ltd.:

Advocate Anoop Prakash Awasthi, Advocate for Okinawa Autotech Pvt. Ltd.

Date: 05.08. 2026

ORDER

1. The present proceedings arise out of a suo motu action initiated by the Central Consumer Protection Authority (hereinafter referred to as the "Authority" or "CCPA") against M/s Okinawa Autotech Private Limited (hereinafter referred to as the "Opposite Party" or "Okinawa"), a manufacturer of electric two-wheelers, in exercise of its powers under the Consumer Protection Act, 2019.
2. The proceedings were initiated pursuant to several incidents reported across the country involving electric two-wheelers manufactured by various manufacturers catching fire, resulting in injuries, loss of property and raising concerns regarding the safety of such vehicles. Considering the potential implications on consumer safety and the rights of consumers purchasing electric vehicles, the Authority initiated proceedings against the Opposite Party to examine whether its conduct disclosed any violation of consumer rights or adoption of unfair trade practices under the Consumer Protection Act, 2019.
3. Accordingly, a Show Cause Notice dated 24.06.2022 was issued to the Opposite Party calling upon it to explain, inter alia, the circumstances leading to such incidents, the safety measures adopted in its electric vehicles, the adequacy of its

quality assurance mechanisms and the measures undertaken to address consumer grievances arising therefrom.

4. The material placed before the Authority, including consumer complaints received through the National Consumer Helpline (NCH), responses furnished by the Opposite Party and other documents brought on record, disclosed recurring grievances relating to after-sales service, delay in repairs, battery replacement, availability of spare parts and consumer grievance redressal. Since these issues directly concern consumer rights and affect a large number of consumers, the Authority considered it appropriate to examine them as part of the present proceedings.
5. Having regard to the material placed before it, the Authority proceeded to examine whether the conduct of the Opposite Party, viewed as a whole, disclosed any violation of consumer rights, misleading advertisement or unfair trade practices warranting action under the Consumer Protection Act, 2019.
6. Pursuant to the issuance of the Show Cause Notice dated 24.06.2022, the Opposite Party filed its reply dated 20.07.2022. The Opposite Party denied the allegations contained in the Show Cause Notice and submitted that the reported fire incidents could not be attributed to any manufacturing defect in its electric vehicles. It was stated that the vehicles manufactured by the Opposite Party complied with the applicable Automotive Industry Standards (AIS) and had obtained the requisite certifications from the Automotive Research Association of India (ARAI). The Opposite Party further explained its quality assurance framework, including supplier selection procedures, component validation, manufacturing quality checks and pre-dispatch inspections, while asserting that adequate mechanisms were in place to address consumer grievances.
7. As the issues involved technical questions relating to the safety of electric vehicles, the Authority considered it necessary to obtain the inputs of expert bodies. Accordingly, comments were sought from the Bureau of Indian Standards (BIS) and the Automotive Research Association of India (ARAI) seeking their comments on the safety aspects of the vehicles manufactured by the Opposite Party and the adequacy of the applicable technical standards. BIS informed the Authority that the issues raised fell outside the scope of its standardisation activities. ARAI informed

the Authority regarding the enhanced battery safety standards introduced through the amended AIS-156 and further confirmed that the electric two-wheeler models manufactured by the Opposite Party complied with the applicable requirements.

8. The matter was listed for hearing before the Authority on 26.10.2023. During the hearing, the Authority considered the reply filed by the Opposite Party, the technical material available on record and the complaints received regarding fire incidents involving electric two-wheelers. The Authority observed that the matter involved issues extending beyond individual fire incidents and required examination of the overall consumer protection framework adopted by the Opposite Party. The Opposite Party was, therefore, directed to furnish further information regarding its manufacturing processes, battery safety protocols, quality assurance measures, supplier evaluation mechanism, consumer grievance redressal system and after-sales service framework.
9. The matter was thereafter heard on 31.10.2023. During the hearing, the Authority examined the consumer complaints available on the National Consumer Helpline and noted that a substantial proportion of the complaints related to delays in repairs and deficiencies in after-sales service. The Authority also expressed concern regarding the adequacy of the Opposite Party's quality audits, the investigation undertaken in relation to the reported fire incidents, and discrepancies noticed in certain complaints placed on record. Accordingly, the Opposite Party was directed to furnish a comprehensive response addressing each of the concerns raised by the Authority, together with supporting documents.
10. Pursuant to the directions issued during the hearings, the Opposite Party submitted a detailed reply dated 17.11.2023. The reply elaborated upon the manufacturing and quality management systems adopted by the company, including its IATF-16949 certification, supplier qualification procedures, incoming material inspections, assembly line quality controls, pre-dispatch inspections and dealer-level checks. The Opposite Party also furnished details of its consumer grievance redressal mechanism, complaint handling process and the status of complaints received through the National Consumer Helpline. It reiterated that the majority of consumer complaints related to service issues rather than manufacturing defects and

maintained that its vehicles complied with the applicable safety standards prescribed by ARAI.

11. The matter was heard on 17.11.2023. Upon consideration of the reply filed by the Opposite Party, the Authority sought further clarification regarding the recurring complaints relating to battery replacement, delays in repairs, availability of spare parts and the adequacy of the grievance redressal mechanism. The Authority also required the Opposite Party to furnish specific information in relation to certain complaints involving incidents of fire where the factual position remained disputed.

12. The matter was again taken up on 20.11.2023. During the hearing, the Authority specifically examined Docket Nos. 4721526 and 4754698 concerning reported fire incidents. The Opposite Party was directed to place on record complete factual reports in respect of the said complaints, including the outcome of its internal investigation, the compensation, if any, extended to the affected consumers, and the remedial measures undertaken by it.

13. In compliance with the aforesaid directions, the Opposite Party filed an additional reply dated 23.11.2023. In respect of Docket No. 4721526, it submitted that the complainant had accepted compensation offered by the company and contended that the incident was attributable to non-adherence to usage instructions and alteration of the vehicle. In relation to Docket No. 4754698, the Opposite Party disputed the ownership details of the vehicle, contended that the vehicle had been purchased through an unauthorised dealer, asserted that the battery involved in the incident did not belong to the company, and placed on record the action initiated by it against the concerned dealer.

14. As consumer grievances continued to be received, the Authority considered it necessary to review the prevailing position with regard to consumer complaints and the corrective measures undertaken by the Opposite Party. Accordingly, vide letter dated 22.04.2025, a hearing was scheduled on 05.05.2025 and vide Order dated 06.05.2025, the Opposite Party was directed to furnish updated information regarding: (i) the current status of consumer complaints; (ii) grievance redressal mechanisms adopted by the company; (iii) corrective measures implemented since the earlier hearings; (iv) the status of specific complaints identified by the Authority; and (v) measures undertaken to strengthen after-sales service.

15. In response, the Opposite Party filed a reply dated 19.05.2025. The reply primarily addressed the Authority's queries regarding Docket No. 4754698. The Opposite Party submitted that the invoice relied upon by the complainant post-dated the alleged incident, that the concerned dealer had ceased to be an authorised dealer of the company and that the battery involved in the incident was not traceable to the company. It further submitted that a QR-code based dealer verification mechanism was being developed and that consumer advisories were being issued to enable purchasers to identify authorised dealerships.

16. Thereafter, vide reply dated 22.05.2025, the Opposite Party furnished updated information regarding the complaints received through the National Consumer Helpline and explained the methodology adopted by it for categorisation and disposal of consumer grievances. The Opposite Party also provided details of its service network, grievance handling mechanism and the steps taken for expeditious resolution of complaints.

17. By way of a detailed submission dated 29.05.2025, the Opposite Party placed on record grievance-wise analyses, complaint summaries and category-wise data relating to consumer grievances. The reply contained information regarding complaints relating to delays in repairs, battery replacement, non-provision of promised services and grievance redressal. The Opposite Party also explained the measures adopted to improve consumer support, including strengthening of service operations, deployment of dedicated grievance resolution teams and monitoring of complaint resolution.

18. The Opposite Party thereafter filed further replies dated 05.06.2025 and 10.06.2025 furnishing supplementary information sought by the Authority. These replies included repeated complaint analyses, updated complaint statistics, management information system (MIS) reports, complaint escalation mechanisms, details regarding closure of grievances and additional supporting documents relating to the functioning of its consumer grievance redressal system. The Opposite Party also sought to explain the reasons for delays in certain categories of complaints and the measures adopted to minimise such delays.

19. The Authority has carefully considered the Show Cause Notice, the replies and documents filed by the Opposite Party from time to time, the technical inputs

received from BIS and ARAI, the proceedings conducted on various dates, the complaint data placed on record and all other material available before it.

20. Having considered the pleadings, documents and submissions placed on record during the course of the proceedings, the Authority proceeds to examine the issues arising in the present matter.

21. During the course of the proceedings, the material placed before the Authority disclosed wider concerns relating to the manner in which consumer grievances were being addressed by the Opposite Party, particularly with respect to after-sales services, battery replacement, repair timelines, availability of spare parts and consumer grievance redressal.

22. The Authority has, therefore, examined the present matter on the basis of the entire material available on record, including the Show Cause Notice, the replies and documents furnished by the Opposite Party from time to time, the technical inputs received from the expert bodies, the complaint data received through the National Consumer Helpline (NCH), grievance-wise information furnished by the Opposite Party pursuant to the directions issued by the Authority, and the submissions advanced during the course of hearings.

23. The material placed on record broadly falls into three categories. The first relates to the technical and safety aspects of the electric vehicles manufactured by the Opposite Party, including the applicable safety standards, certifications and manufacturing processes. The second relates to consumer grievance data, including complaints concerning battery replacement, delays in repairs, availability of spare parts, warranty obligations and after-sales service. The third relates to the corrective measures stated to have been implemented by the Opposite Party during the pendency of the proceedings for strengthening its consumer grievance redressal framework and service infrastructure.

24. The Authority has carefully examined the aforesaid material to determine whether the conduct of the Opposite Party has resulted in violation of consumer rights under Section 2(9) of the Consumer Protection Act, 2019 and whether such conduct amounts to an unfair trade practice within the meaning of Section 2(47) of the Act.

25. The material placed on record indicates that the electric two-wheeler models manufactured by the Opposite Party have obtained certification under the applicable

Automotive Industry Standards (AIS), including the revised AIS-156 standards introduced pursuant to the recommendations of the Expert Committee constituted by the Ministry of Road Transport and Highways. The Authority also notes the submissions of the Opposite Party regarding the quality assurance measures adopted during procurement, manufacturing, assembly and pre-dispatch inspection of its vehicles.

26. The Authority has also examined the explanations furnished by the Opposite Party in respect of the specific fire incidents referred to during the proceedings, including the complaints bearing Docket Nos. 4721526 and 4754698. The Opposite Party has attributed these incidents to factors such as non-adherence to operating instructions, intervention by unauthorised dealers and use of components allegedly not traceable to the company. The Authority notes that compensation has also been stated to have been extended in one of the cases.

27. Having considered the entire material available on record, the Authority is of the view that the present proceedings do not disclose sufficient material to conclusively attribute the reported fire incidents to any manufacturing defect in the electric vehicles manufactured by the Opposite Party.

28. However, the absence of conclusive evidence regarding manufacturing defects does not conclude the inquiry under the Consumer Protection Act, 2019. The obligations of a manufacturer are not confined merely to ensuring compliance with technical standards at the stage of manufacture. A manufacturer also bears a continuing responsibility to ensure that consumers receive effective after-sales support, timely repair and replacement services, accessible grievance redressal mechanisms and appropriate assistance in the event of product-related concerns. These obligations assume greater significance in respect of electric vehicles, where consumers are substantially dependent upon the manufacturer's service infrastructure for maintenance, repairs and replacement of critical components.

29. While the proceedings were initiated in the backdrop of reported fire incidents involving electric two-wheelers, the material that emerged during the course of the proceedings disclosed a broader and more persistent concern relating to the post-sale obligations of the Opposite Party towards its consumers. The Authority observed that a significant proportion of the grievances received against the

Opposite Party did not pertain to the occurrence of fire incidents themselves, but to delays in repairs, battery replacement, availability of spare parts and deficiencies in consumer grievance redressal. These issues assume particular significance in the electric vehicle sector, where consumers remain substantially dependent upon the manufacturer's service ecosystem throughout the operational life of the vehicle.

30. During the hearing, Sh. Anoop Prakash Awasthi, who appeared on behalf of the opposite party also submitted that the grievance redressal mechanism had undergone significant improvements over time, that dedicated efforts had been undertaken to strengthen consumer support, and that the volume of complaints had substantially reduced compared to earlier years. Learned counsel fairly acknowledged that the grievance redressal system existing during the earlier period was not sufficiently robust but submitted that considerable improvements had since been implemented.

31. The Authority, however, expressed concern that the complaint data available on record continued to indicate recurring grievances relating to battery replacement, non-availability of spare parts and delays in providing after-sales service. Referring to the analysis of complaints received through the National Consumer Helpline, the Authority observed that the numerical trend did not fully support the contention that consumer grievances had significantly reduced. The Authority further referred to specific complaints placed on record, wherein consumers alleged prolonged delays in replacement of batteries despite warranty coverage, repeated visits to service centres without resolution, non-functional customer support channels and mechanical or standardised responses to grievances despite the consumers having already approached authorised dealers.

32. The Authority also observed that the grievance redressal process appeared, in several cases, to rely substantially upon responses furnished by authorised dealers and sought clarification regarding the mechanisms adopted by the Opposite Party to independently verify whether complaints had in fact been satisfactorily resolved before being treated as closed. The Authority emphasised that, by the time a consumer approaches the National Consumer Helpline, the consumer would ordinarily have exhausted the grievance redressal mechanism established by the manufacturer. Therefore, complaints reaching the National Consumer Helpline

required careful examination, particularly where they disclosed repeated allegations of unresolved service deficiencies.

33. In some cases, the response furnished towards the redressal of the grievance appeared to be standardised and mechanical in nature and did not adequately address the specific grievances raised by consumers. The Authority noted that despite consumers indicating that they had already approached the authorised dealer and remained dissatisfied, the responses in several cases merely advised them to revisit the dealer or follow the standard service procedure, without specifically addressing the grievance narrated by the consumer.

34. A consumer purchasing an electric vehicle legitimately expects that the manufacturer shall not only supply a product conforming to the prescribed technical standards but shall also maintain an effective after-sales support system capable of ensuring timely repairs, replacement of critical components, availability of spare parts and prompt resolution of consumer grievances. In products involving specialised technology such as lithium-ion batteries, controllers and battery management systems, consumers ordinarily have little or no ability to procure compatible components or undertake repairs independently. Consequently, deficiencies in after-sales service directly affect the utility of the product and the consumer's ability to use it for its intended purpose.

35. In order to assess whether the grievances received against the Opposite Party represented isolated instances or indicated a systemic pattern, the Authority examined the complaint data available on the National Consumer Helpline (NCH) together with the grievance-wise analyses and complaint summaries furnished by the Opposite Party pursuant to the directions issued during the proceedings.

36. The material placed on record reveals that the majority of consumer grievances pertain to post-sale obligations rather than product specifications. The grievance summaries furnished by the Opposite Party itself indicate that 361 complaints relate to delay in providing services while vehicles remained at service centres for repair, 120 complaints relate to non-provision of promised services, and 62 complaints concern unsatisfactory grievance redressal. The Authority further notes that, during the hearing held on 31.10.2023, it was observed that nearly seventy per cent of the

complaints received through the National Consumer Helpline related to deficiencies in after-sales service.

37. The significance of these figures lies not merely in their numerical value but in the nature of the grievances disclosed. The complaints consistently reveal allegations of prolonged delays in battery replacement, non-availability of spare parts, repeated visits to service centres without effective resolution, prolonged periods during which vehicles remained unusable, closure or inaccessibility of dealerships, and failure to honour warranty commitments within a reasonable period.

38. The Authority has carefully considered the explanations furnished by the Opposite Party attributing certain complaints to factors such as closure of dealerships, consumer non-compliance with service schedules, incomplete information furnished by consumers, unauthorised repairs, portal-related issues and organisational restructuring. While such circumstances may explain individual complaints, they do not satisfactorily account for the recurring nature of grievances observed across multiple years and across different regions of the country. Nor do they diminish the continuing obligation of the manufacturer to ensure that consumers are provided with accessible service facilities and effective grievance redressal.

39. The Authority also takes note of the measures stated to have been undertaken by the Opposite Party during the pendency of the proceedings, including the deployment of dedicated grievance resolution teams, organisation of service camps, strengthening of dealer monitoring mechanisms, introduction of consumer awareness initiatives and development of dealer verification systems. These measures are welcome and reflect an acknowledgment of the need to strengthen consumer support. However, the necessity of introducing such measures during the pendency of the proceedings itself demonstrates that substantial improvements in the grievance redressal framework were considered necessary by the Opposite Party.

40. The Authority also notes that the material placed on record demonstrates a gradual strengthening of the Opposite Party's consumer grievance redressal framework during the pendency of the present proceedings. Pursuant to the directions issued by the Authority from time to time, the Opposite Party furnished successive replies explaining the evolution of its grievance management system, including the

establishment of a structured grievance redressal mechanism accessible through its website, deployment of dedicated grievance resolution teams, strengthening of dealer monitoring processes, introduction of complaint escalation mechanisms, organisation of service camps, development of dealer verification systems and maintenance of complaint-wise tracking and management information systems. During the final hearing, the Opposite Party also acknowledged that its grievance redressal mechanism, particularly during the earlier period, was not sufficiently robust and submitted that substantial improvements had since been implemented to strengthen consumer support and expedite resolution of grievances.

41. The Authority further observes that the complaint data and submissions placed on record indicate an overall improvement in the grievance redressal framework over the course of the proceedings. While the recurring deficiencies discussed hereinabove continued to warrant regulatory scrutiny, the subsequent measures undertaken by the Opposite Party reflect a conscious effort to address the shortcomings identified during the proceedings and to improve its after-sales service infrastructure. The Authority considers these developments to be a positive outcome of the present proceedings. Nevertheless, such subsequent improvements cannot dilute or erase the deficiencies that affected consumers during the period under examination, nor do they absolve the Opposite Party of its obligations under the Consumer Protection Act, 2019.

42. The Authority further observes that the closure or discontinuation of dealerships, organisational restructuring or disputes with authorised dealers cannot operate to the prejudice of consumers. A consumer enters into a transaction on the strength of the reputation and assurances of the manufacturer. Consequently, the manufacturer cannot avoid its continuing obligations under the Consumer Protection Act, 2019 by attributing deficiencies in after-sales service to dealers or other intermediaries engaged by it.

43. The Opposite Party has placed considerable reliance upon the corrective measures introduced during the pendency of these proceedings, including strengthening of grievance redressal mechanisms, deployment of dedicated service teams, organisation of service camps and implementation of improved dealer monitoring systems. While the Authority appreciates these initiatives, they do not efface the

deficiencies that existed during the period under consideration. At the same time, these measures are relevant while considering the nature of the directions required to secure future compliance.

44. Having regard to the cumulative effect of the material placed on record, the Authority is satisfied that the deficiencies in after-sales service and consumer grievance redressal have adversely affected the rights of consumers to receive timely and effective redressal and to derive the intended benefit from the products purchased by them. Such conduct constitutes a violation of consumer rights within the meaning of the Consumer Protection Act, 2019.

45. An unfair trade practice is not confined to false advertisements or misleading representations made at the stage of sale. The scheme of the Consumer Protection Act, 2019 envisages fairness throughout the consumer transaction. Where a manufacturer induces consumers to purchase its products by representing that adequate warranty support, after-sales service and customer assistance shall be available, such representations necessarily carry with them a corresponding obligation to ensure that the promised services are, in fact, provided within a reasonable time and in an effective manner.

46. In the facts and circumstances of the present case, the Authority is satisfied that the recurring and systemic deficiencies in the after-sales service and grievance redressal mechanism maintained by the Opposite Party have caused inconvenience and prejudice to consumers on a significant scale. Such conduct falls short of the standard of fairness expected of a manufacturer operating in a sector where consumers are substantially dependent upon the manufacturer for maintenance, repairs and replacement of critical components.

47. On an overall consideration of the material available on record, the Authority is of the view that the consumer grievances disclosed in the present proceedings cannot be characterised as sporadic or isolated incidents.

48. In exercise of the powers conferred under the Consumer Protection Act, 2019, and having regard to the findings recorded hereinabove, the Authority hereby directs M/s Okinawa Autotech Private Limited to:

    a. ensure that an effective and adequately staffed consumer grievance redressal mechanism is maintained to facilitate prompt resolution of

consumer complaints relating to repairs, warranty claims, battery replacement and after-sales services;

b. ensure that consumers are provided with clear information regarding authorised dealers, service centres and the procedure for availing warranty and after-sales services, including by maintaining updated information on its official website and other consumer interfaces;

c. put in place an effective monitoring mechanism for timely disposal of complaints relating to battery replacement, availability of spare parts and repairs, and periodically review such complaints to identify recurring issues requiring systemic corrective action;

d. ensure that closure or discontinuation of dealerships does not adversely affect consumers and that appropriate alternate service arrangements are made available to consumers within a reasonable period;

e. The Opposite Party shall submit a compliance report to the Central Consumer Protection Authority (CCPA), detailing the improvements made to its grievance redressal mechanism during the course of these proceedings and the steps taken to comply with the directions contained in this Order, within 15 days from the date of this Order.

The above order and directions are passed in exercise of the powers conferred upon CCPA under section 10, 20, 21 of the Consumer Protection Act 2019.

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Nidhi Khare

Chief Commissioner

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Anupam Mishra

Commissioner