

Online Dispute Resolution (ODR): Legal Analysis and Implementation in Selected Countries

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Abstract

This study analyzes the legal frameworks and practical implementation of Online Dispute Resolution (ODR) across selected countries, including China, Pakistan, Indonesia, Japan, the European Union (EU), the United Kingdom (UK), and the United States (US). Employing a qualitative legal comparative analysis, data were collected from statutory provisions, government policies, judicial regulations, and relevant academic literature. The findings reveal that countries such as China, the EU, and the US have achieved a high level of maturity in ODR implementation through comprehensive government policies, the integration of Artificial Intelligence (AI), and well-established digital judicial systems. Conversely, countries such as Pakistan and Indonesia continue to face challenges stemming from legal ambiguity, limited technical capacity, and low consumer trust. The study further finds that the effectiveness of ODR implementation depends not only on technological infrastructure but also on coherent legal frameworks, clear enforcement mechanisms, and strong institutional support. Overall, the integration of ODR into national and international legal systems represents a paradigm shift toward a more inclusive, efficient, and future-oriented model of justice in the digital era.

Keywords: Online Dispute Resolution (ODR), Comparative Legal Analysis, E-Commerce, Artificial Intelligence, Access to Justice

Introduction

The rapid integration of technology into various aspects of daily life, including the legal sector, has profoundly reshaped the landscape of dispute resolution (Cebola & Monteiro 2024). This paradigm shift has led to the emergence and proliferation of Online Dispute Resolution systems, which offer a technologically advanced alternative to traditional dispute resolution

mechanisms (Chauhan 2023; Peters 2021). ODR leverages digital platforms to facilitate mediation, arbitration, and negotiation, thereby addressing common challenges associated with conventional litigation such as high costs, lengthy proceedings, and geographical barriers (Reddy 2025; Ojiako et al. 2017). The COVID-19 pandemic further accelerated the adoption of ODR, compelling legal systems worldwide to embrace digital solutions to maintain access to justice while ensuring public safety (Wasser 2021). Despite its growing prominence, ODR is still largely considered a niche area within Alternative Dispute Resolution, necessitating further research to ascertain its practical relevance and identify specific areas requiring refinement (Ojiako et al. 2017).

Accordingly, this study aims to analyze the legal frameworks and practical implementation of Online Dispute Resolution (ODR) across selected countries including China, Pakistan, Indonesia, Japan, the European Union, the United Kingdom and the United States to identify best practices and challenges in promoting fair, efficient, and accessible online dispute mechanisms. Methodologically, this study employs a qualitative legal analysis based on a comparative approach. Data were collected through the examination of statutory provisions, judicial regulations, government policy documents, and scholarly literature relevant to ODR practices in the selected countries. The comparative method allows for the identification of similarities and differences in ODR frameworks, thereby highlighting the extent to which technological innovations align with each jurisdiction's legal traditions and regulatory objectives.

Discussion

ODR in Asian Countries

The implementation of Online Dispute Resolution (ODR) in Asian countries has shown significant progress despite facing diverse challenges depending on each country's context. In East Asia, China and India are among the leading nations in developing ODR systems. In China, special courts known as Internet Courts have been established in Hangzhou, Beijing, and Guangzhou, which extensively utilize ODR technology. Additionally, consumer platforms such as the Alibaba Consumer Protection Platform handle millions of e-commerce disputes each year. Moreover, the Supreme People's Court of China has issued official guidelines for the use of ODR within its judicial system (Ballesteros & Avila 2024). Meanwhile, in India, the government launched the e-Courts project to digitalize court processes, including ODR components. The emergence of platforms such as SAMA also provides alternative online solutions for commercial and consumer disputes. Furthermore, laws such as the Indian Arbitration and Conciliation Act have been amended to facilitate the implementation of online arbitration.

At the regional level, ASEAN has played a vital role in harmonizing policies and guidelines related to Online Dispute Resolution (ODR). In March 2023, ASEAN introduced the *ASEAN Guidelines for Consumer Protection in Electronic Commerce*, which outline guiding principles and recommended measures for member states to protect consumer rights in e-commerce transactions. These measures encompass the right to information, freedom of choice, payment security, and consumer privacy protection. To streamline cross-border dispute resolution mechanisms, ASEAN also issued the *ASEAN Alternative Dispute Resolution (ADR) Guidelines* in 2021 and the *ASEAN Online Dispute Resolution (ODR) Guidelines* in 2022, in addition to launching various initiatives such as training seminars, best practice sharing,

and the establishment of regional networks. These efforts also involve collaboration with international organizations such as UNCITRAL to explore best practices in cross-border dispute resolution (Zuo et al. 2024).

As one of the active members of ASEAN, Malaysia has also developed its ODR mechanisms based on the legal framework governing e-commerce and online platforms. Relevant laws include the *Electronic Government Activities Act 2007 (Act 680)* and the *Digital Signature Act 1997 (Act 562)*, which aim to regulate electronic transactions and protect the rights of the parties involved. ODR platforms in Malaysia provide services such as complaint submission, mediation, and arbitration, which facilitate dispute resolution between consumers and traders. Consumer protection agencies play a crucial role in supervising and guiding the dispute resolution process. If a dispute cannot be resolved online, the case is referred to the conventional judicial system. Overall, Malaysia's approach to ODR emphasizes efficiency, fairness, and accessibility while supporting the growth of e-commerce and safeguarding the rights of both consumers and traders (Zuo et al. 2024).

Based on the discussion on the implementation of Online Dispute Resolution (ODR) in Asian countries, this section will focus on several selected countries that have demonstrated significant progress in this field, including:

ODR in China

China is among the earliest and most proactive countries in developing an Online Dispute Resolution (ODR) system, particularly in the context of e-commerce and cyber disputes. One of the most significant initiatives is the implementation of digital mediation through internally integrated ODR platforms, strongly supported by the national e-commerce industry. The courts in China have undergone a radical transformation by fully adopting digital processes, including the establishment of three Internet Courts in major cities such as Hangzhou, Beijing, and Guangzhou. By 2019, these three courts had handled more than 120,000 dispute cases, reflecting the effectiveness and accessibility of dispute resolution through digital platforms (Batdulam 2023).

The Hangzhou Internet Court, in particular, is recognized as a leading model in resolving internet and e-commerce-related disputes. The judicial procedures implemented emphasize the use of online mediation, where mediators interact with the disputing parties through telephone, online communication, and video conferencing. This approach aligns with the concept of the Internet Court, which integrates technological convenience with the principles of justice. Furthermore, these courts have also shown a growing inclination toward the integration of Artificial Intelligence (AI) technologies, paving the way for the future implementation of AI-driven dispute resolution systems.

All these processes are governed by a set of procedural standards outlined in the *Rules of Procedure for the Control of Electronic Matters of the People's Republic of China*, which came into effect on 1 August 2021. Although the actual effectiveness of these guidelines continues to be evaluated, the implementation of electronic mediation has proven to be increasingly robust within China's judicial system (Batdulam 2023). However, concerns regarding information security in electronic mediation processes remain a significant challenge requiring particular attention. As a responsive measure, in 2019 several key

ministries in China including the Ministry of Industry and Information Technology, the Cyberspace Administration, the Ministry of Public Security, and the State Administration for Market Regulation issued specific guidelines on the monitoring, collection, and use of personal data by software applications. This initiative reflects China's ongoing commitment to strengthening and refining its digital dispute resolution system, thereby reinforcing its position as a global leader in the implementation of ODR.

ODR in Pakistan

ODR in Pakistan remains at an early stage and faces several major challenges from legal, technical, and consumer confidence perspectives. Although Pakistan has recognized the vast potential of digitalization in the commercial sector, the absence of a specific legal framework to protect e-commerce consumers has raised concerns among stakeholders in the internet industry. The *Alternative Dispute Resolution Act 2016* enacted in Pakistan does not cover aspects of e-commerce or ODR, rendering the existing mechanisms ineffective, outdated, and unsatisfactory. Consequently, consumers have limited trust in Pakistan's digital marketplace. This issue is also acknowledged in the country's first *E-Commerce Policy Framework* issued by the Ministry of Commerce, which emphasized that the sustainability of the e-commerce model depends on consumer trust. Therefore, consumer protection has become a key priority that must be addressed through the revision and enhancement of the existing legal framework (Akhtar et al. 2022; Ali 2019).

Although Pakistan's e-commerce policy was introduced in 2019 as part of the *Digital Pakistan* strategy, its implementation continues to face significant obstacles. The objective of this policy is to reform the entire traditional trade system by focusing on strengthening consumer protection within the digital sector. However, the first consumer protection legislation was only introduced in 1995, and its implementation at the provincial level after the 18th Amendment to the Constitution in 2010 remains incomplete. This has resulted in persistent issues regarding consumer claims in online transactions and the security of electronic dealings, in addition to weaknesses in the enforcement of existing policies (Qaiser et al. 2020).

In the context of electronic contracts, although online transactions in Pakistan are conducted in accordance with the principle of good faith under contract law, the reality is quite the opposite. Issues such as inadequate government oversight, power supply disruptions, low internet penetration rates, and high broadband requirements have rendered online communication ineffective, thereby undermining the efficiency of digital transactions. These constraints have not only resulted in unresolved consumer complaints but have also negatively impacted the country's economic growth (Khan et al. 2018).

Furthermore, Pakistan clearly lacks a specific legal framework to regulate ODR. Legal ambiguity remains a major issue that undermines the confidence of parties engaged in e-commerce to utilize ODR mechanisms. The absence of robust consumer protection laws also renders digital dispute resolution in the country unconvincing. To date, it remains uncertain whether Pakistan's efforts to address this issue are genuinely serious, given that the existing legislation is highly inadequate to meet both current and future challenges (Hattotuwa 2012).

In addition, language barriers and a lack of technological literacy among users have also contributed to the difficulties in implementing ODR in Pakistan. Most ODR services are offered only in English, making information difficult to comprehend and potentially causing misunderstandings, especially among users who are not proficient in the language. Although computer usage is becoming more widespread, a technological skills gap still exists, preventing users from fully benefiting from ODR facilities. The absence of uniform technical standards across countries further adds to the complexity. Therefore, if Pakistan intends to fully capitalize on the opportunities of global digital trade, a comprehensive understanding of ODR mechanisms and legal frameworks applied at the international level is essential. The government and private sector in Pakistan must work hand in hand to strengthen the nation's capacity to address consumer complaints effectively, thereby establishing ODR as a reliable and accessible mechanism for all parties (Akhtar et al. 2022).

ODR in Indonesia

ODR in Indonesia has developed in line with ASEAN's regional aspirations, which aim to enhance consumer confidence in cross-border transactions through the *ASEAN Strategic Action Plan for Consumer Protection 2016–2025 (ASAPCP)*. The third goal of the plan, namely "High Consumer Confidence in the AEC and Cross-border Commercial Transactions is Instituted," directly calls upon member states to optimize the implementation of ODR mechanisms. As one of the member countries, Indonesia is no exception in strengthening this initiative, particularly in the rapidly growing e-commerce sector (Sudiarawan et al. 2024).

E-commerce, as a modern form of business, has eliminated the need for the physical presence of the parties involved as well as printed documentation, which is customary in conventional transactions. Consequently, ODR has emerged as the most suitable form of dispute resolution for e-commerce, as it offers time-, cost-, and energy-efficient solutions. Furthermore, the implementation of ODR provides legal certainty across geographical boundaries through the enactment of *Government Regulation of the Republic of Indonesia No. 71 of 2019 on the Implementation of Electronic Systems and Transactions (PP 71/2019)*. However, the enforcement of ODR as an official mechanism for e-commerce dispute resolution is not explicitly stipulated in PP 71/2019. Instead, the regulation emphasizes that the principle of freedom of contract remains applicable, allowing parties to determine the dispute resolution mechanism and governing law to be used in electronic contracts, as stated in Article 47(3) (Sudiarawan et al. 2024).

From the perspective of enforcing ODR decisions, a major issue that arises concerns the status and effectiveness of arbitration awards conducted online. Since arbitrators do not possess executive authority to directly enforce their decisions, this responsibility falls upon the national judicial system, which must adhere to the provisions and procedures established under domestic law. Indonesian law classifies arbitration awards into two categories: domestic and international, as stipulated in *Law No. 30 of 1999 on Arbitration and Alternative Dispute Resolution (UU 30/1999)*. If the seat of arbitration is located within Indonesia, it is considered domestic arbitration; whereas if it is conducted by a foreign institution outside Indonesia's jurisdiction, it is regarded as international arbitration, as provided under Article 1(9) of UU 30/1999 (Nikam & Singh 2022).

In addition, the effectiveness of enforcing online arbitration awards is also governed by Articles 59(1) to (4) of *Law No. 30 of 1999 (UU 30/1999)*, which require that an authenticated copy of the arbitration award be registered by the arbitrator or their representative with the Registrar of the Central Jakarta District Court within 30 days from the date of the decision. Failure to comply with this requirement renders the arbitration award unenforceable under the law. Nevertheless, the law still permits the entire arbitration process to be conducted online, thereby providing significant opportunities for the comprehensive implementation of ODR in Indonesia (Nikam & Singh 2022).

ODR in Japan

ODR in Japan has been receiving increasing attention from the government, particularly following the establishment of the *ODR Support Council* on 17 July 2020. The creation of this council reflects the Japanese government's commitment to positioning electronic dispute resolution as an essential social infrastructure within the national dispute resolution system. This initiative is not only administrative in nature but also aims to raise public awareness of the advantages of online mediation, which is flexible and responsive to the needs of modern society (Batdulam 2023).

The council emphasizes that electronic mediation offers various advantages, including flexibility in case management, procedural simplicity, speed of resolution, confidentiality of information, and adaptability to the unique circumstances of each dispute. Moreover, access to these services is highly convenient, as they can be utilized via smartphones, allowing disputes to be resolved anytime and anywhere without the need for physical presence. This approach not only accelerates the resolution process but also enhances the overall efficiency of the justice system in the digital era.

ODR in the European Union (EU)

ODR in the European Union (EU) represents the most comprehensive and structured approach at the international level. The EU's early initiatives in pioneering supranational legislation on ODR began between 2004 and 2013 and were fully implemented on 15 February 2016 with the official launch of the EU ODR platform, which was made accessible to both online consumers and traders (Omoola & Oseni 2016). This effort aligns with the objectives of the United Nations Working Group III on ODR, which seeks to strengthen consumer protection in the digital era, particularly in cross-border transactions.

The EU's journey toward a robust ODR legal framework was gradual and spanned over several years. It began with Directive 2009/22/EU on the protection of consumers' interests, followed by Directive 2013/11/EU (the ADR Directive) and Regulation (EU) No. 524/2013 (the ODR Regulation), which formally established the legal framework for online consumer dispute resolution across EU Member States (Ariyaratna 2020; Calliess & Heetkamp 2019). The regulation obliges online businesses to provide a link to the ODR platform on their websites and enables consumers to submit complaints easily, including through the use of automatic translation services to facilitate the resolution of cross-border disputes (Ballesteros & Avila 2024).

ODR in the European Union (EU) functions as a low-cost, efficient, and user-friendly out-of-court dispute resolution system, primarily aimed at enhancing consumer confidence

in the EU's digital single market. Through the official ODR platform administered by the European Commission, consumers and traders are able to lodge complaints and engage with accredited ODR providers within their respective member states. However, the ODR Regulation does not prescribe any specific method of resolution; disputes may be settled through various ADR mechanisms such as mediation, arbitration, or negotiation, and the process does not necessarily have to be conducted entirely online. Furthermore, the regulation stipulates that the dispute resolution process must be completed within 90 calendar days without requiring the physical presence of the parties involved, thereby underscoring the flexibility and efficiency of the EU's regional framework for alternative dispute resolution (Calliess & Heetkamp 2019).

In an effort to strengthen the use of the ODR platform, the European Commission publishes annual reports assessing its effectiveness. For instance, between 15 February 2017 and 14 February 2018, more than 36,000 complaints were submitted a 50% increase compared to the previous year. However, only 2% of these complaints proceeded to an ADR/ODR body, while 81% were automatically closed after the parties failed to reach an agreement within 30 days (Calliess & Heetkamp 2019). These statistics indicate that there remain significant challenges in encouraging trader participation in the ODR process, even though nearly half of consumers managed to reach an amicable settlement after filing their complaints.

From a technical and implementation perspective, the European Union (EU) places great emphasis on data security, user privacy, and transparency in the management of information by ODR service providers. The platform is supervised by the EU Council and offers its services free of charge to consumers, including notifications to the respondent party and the provision of electronic tools for dispute resolution (Batdulam 2023). Moreover, each ODR centre is required to have at least two expert consultants in ODR, reflecting the EU's strong commitment to ensuring quality and professionalism in the operation of its online dispute resolution framework.

In recent developments, the use of Artificial Intelligence (AI) has also been considered within the EU's dispute resolution system. Although AI technology still requires human intervention in the legal domain, the EU outlines principles for human-centred, transparent, and accountable AI development. This approach is integrated with the General Data Protection Regulation (GDPR) framework and aims to build consumer trust in technology, particularly when personal data is involved in the dispute resolution process (Peters 2021). The increasing attention to AI reflects the EU's broader strategy to modernize its dispute resolution mechanisms through technological innovation while maintaining ethical and legal oversight.

Building upon this technological evolution, the official closure of the European Union Online Dispute Resolution (EU ODR) Platform on 20 July 2025 marks a significant shift in the cross-border consumer protection framework within the region. Introduced in 2016 under Regulation (EU) No. 524/2013, the platform served as a multilingual digital portal connecting consumers and traders to Alternative Dispute Resolution (ADR) bodies across the EU. However, its utilisation remained low, with only around 200 cases per year. The termination decision, enacted through the EU Council and Regulation (EU) 2024/3228, stemmed from

administrative challenges, high operational costs, and the need for a more modern digital approach. This move aligns with the reform of Directive 2013/11/EU on ADR, aimed at expanding the scope of disputes, strengthening consumer rights, and developing a new platform better adapted to current technologies. Consequently, traders are required to remove links to the ODR platform from their websites, while consumers may still seek redress through national ADR bodies. Overall, the closure of the EU ODR Platform does not signify the end of online dispute resolution but rather a transition toward a more efficient, responsive, and technologically adaptive system aligned with the evolving global digital marketplace (Morek 2025).

ODR in the United Kingdom (UK)

ODR in the United Kingdom demonstrates that the country possesses a strong legal framework for regulating e-commerce agreements and ensuring the protection of digital consumers. Among the key regulations implemented are the EU Directive 2000/31/EC, Consumer Protection Regulations 2000, EU E-Commerce Directive 97/7, and the E-Commerce Regulation 2002 (Akhtar et al. 2022). In addition, the implementation of Regulation (EU) 524/2013, known as the Online Dispute Resolution Regulation, introduced a free online system accessible in all EU languages, allowing consumers and traders from member states to resolve disputes related to online sales or service transactions. This system also enables consumers to directly connect with accredited Alternative Dispute Resolution (ADR) providers across the EU. Furthermore, all traders offering online products or services were required to include a link to the ODR system on their main webpage. However, following Brexit, the enforcement of the Consumer Protection (Amendment etc.) Regulations 2018 led to the repeal of the Online Dispute Resolution Regulation in the UK. Effective from 1 January 2021, consumers and businesses in the UK no longer have access to the EU ODR system, although they may still directly engage ADR firms based in other European countries (Akhtar et al. 2022).

Apart from the EU ODR system, the United Kingdom has also introduced electronic court proceedings (e-court proceedings) as an alternative approach to resolving online disputes. In this system, the entire or partial judicial process is conducted virtually, involving lawyers, judges, juries, and disputing parties through online communication. The system also employs algorithms to automatically generate administrative or substantive decisions, either with or without human oversight, based on information submitted by the parties involved. This process includes the coordination and assessment of evidence through digital means. For instance, the Civil Resolution Tribunal Act, enacted in British Columbia in 2012 and operational since 2016, allows the tribunal to resolve small claims across various areas of law with a maximum value of Can\$25,000, although it is currently being tested for claims up to Can\$5,000 (Akhtar et al. 2022). This approach signifies a paradigm shift towards a more efficient, cost-effective, and technology-friendly dispute resolution mechanism.

ODR in the United States (US)

The United States is recognized as one of the earliest and most advanced countries in the implementation of Online Dispute Resolution (ODR). The development of ODR in the country has evolved dynamically through various public and private sector initiatives. The strength of the U.S. ODR approach lies in its decentralization, as there is no single federal law that comprehensively governs ODR. Instead, a multi-level approach involving federal, state, and

private sector participation plays a crucial role in shaping the overall ODR landscape (Ballesteros & Avila 2024).

The emergence of Online Dispute Resolution (ODR) in the United States was driven by the recognition that the traditional judicial system was unable to provide comprehensive access to justice, particularly for low-value but high-volume claims. Consequently, ODR was introduced as an alternative dispute resolution mechanism to address issues such as family, employment, debt, and tenancy disputes within a period of only four to five days (Sudiarawan et al. 2024). The process encompasses the provision of information regarding the rights and obligations of the parties, negotiation, and if unsuccessful, third-party intervention through non-litigation methods. All communications and document filings are conducted entirely online via email or messaging applications, rendering the process more flexible in terms of time and location (Sudiarawan et al. 2024).

In practical terms, the electronic court system in the United States has expanded rapidly. By 2019, more than 50 electronic courts had been established across the country. This development not only enhanced access to justice but also significantly reduced costs compared to traditional dispute resolution methods (Batdulam 2023). Three major ODR platforms that have gained global recognition originated in the United States: Modria, Cybersettle, and SquareTrade. Modria, based in San Francisco, provides commercial dispute resolution services and supports the handling of public case backlogs, such as in New York, where it manages over 300,000 cases annually (Batdulam 2023). Cybersettle, which has been operating since 1996, has successfully resolved nearly 200,000 claims valued at more than USD 1.45 billion (Batdulam 2023). Meanwhile, SquareTrade played a significant role in shaping eBay's dispute resolution system, although it has since been fully integrated into the eBay platform.

In terms of policy and legislation, the U.S. approach to e-commerce and ODR is also driven by government initiatives and the efforts of organizations such as the American Bar Association, as well as agencies like the Federal Trade Commission (FTC) and the Consumer Financial Protection Bureau (CFPB). However, the absence of specific federal legislation governing ODR means that its implementation is largely guided by private sector initiatives and various enforcement agencies at the state level (Danesh et al. 2023; Ballesteros & Avila 2024). Nevertheless, the Federal Arbitration Act provides the legal basis for enforcing binding arbitration, including arbitration conducted online (Danesh et al. 2023).

One of the key institutions playing a major role in the development of ODR is the American Arbitration Association (AAA). Established in 1926 as an alternative arbitration institution, the AAA has since introduced additional rules allowing dispute resolution processes to be conducted online if agreed upon by the parties involved (Haryanto & Sakti 2024). The AAA also established the International Centre for Dispute Resolution (ICDR) as its global branch to manage cross-border disputes (Haryanto & Sakti 2024).

The United States has also proposed several draft Model Laws under the Organization of American States (OAS), including a proposal for a cross-border ODR system for claims valued up to USD 10,000. This process allows negotiation, mediation, and arbitration to be conducted online, with disputing parties retaining the right to be represented by legal counsel

and to file claims against sellers from the participating member states (Omoola & Oseni 2016). Furthermore, the proposed Model Laws encompass consumer protections against credit card fraud, simplified and equitable resolution of small claims, and the establishment of enforcement bodies for consumer claims both domestically and internationally (Calliess & Heetkamp 2019).

In the context of developing digital infrastructure, the United States has played a crucial role in ensuring the uninterrupted flow of cross-border data. Since the early 1980s, the U.S. government has supported digital economy policies, including frameworks such as the Global Framework for Electronic Commerce in 1997. At the state level, various e-commerce laws have been enacted, such as the Utah Digital Signature Act in 1995, positioning the U.S. as one of the early pioneers in establishing operational standards for e-commerce (Zuo et al. 2024). Beyond formal institutional approaches, e-commerce platforms like eBay and PayPal have also developed efficient internal ODR systems, serving as models for numerous other companies in resolving disputes digitally (Danesh et al. 2023).

Comparison of ODR Implementation and Legislation Among Selected Countries

Aspects	China	Pakistan	Indonesia	Jepun	UK	EU	US
Infrastructure & Platforms	Internet Courts in Hangzhou, Beijing, Guangzhou; Integration of AI	No Dedicated ODR Infrastructure; Outdated Dispute Resolution System	Online System Based on Freedom of Contract Principle (PP 71/2019); Arbitration (UU 30/1999)	Access via Smartphones; Flexible Mediation	E-Court (CRT Act); Digital System + Algorithm-Based Decision Making	EU ODR Platform Operates Cross-Border; Managed by the European Commission	Multiple Private Platforms (Modria, Cybersettle, squaretrade); 50+ E-Courts Established
Legal Framework	<i>Rules of Procedure for Electronic Matters</i> (2021)	No Specific ODR Legislation; 2016 ADR Act Does Not Cover E-Commerce	<i>Government Regulation No. 71/2019</i> ; <i>UU No. 30/1999 on Arbitration</i>	No Specific Legislation, but ODR Policy Strengthened	Regulation 524/2013 No Longer Applicable Post-Brexit	<i>Directive 2013/11/EU, Regulation 524/2013, Consumer Protection Directive</i>	No Comprehensive Federal Legislation – Regulated by FTC and State Laws
Government Support	Strong – Central Government Supports Judicial Digitization	Weak – Policy Exists but Implementation is Ineffective	Active – Government Enacts Regulations Related to	Strong – Establishment of ODR Support Council by the Government	Limited – Government Permits E-Courts and Private ADR Post-Brexit	Strong – Regulated by the European Commission; Annual Reports Published	Decentralized – Implementation Managed by State Governments and Private Sector; AAA

			Electronic Systems				& ICDR Play Key Roles
Unique Features / Distinctive Characteristics	Automated Mediation, AI, Specialized E-Commerce Courts	Weak in Terms of Technical Capacity and Consumer Protection	Emphasis on Contract Principles & Freedom to Choose Dispute Resolution Mechanisms	Focus on Flexibility and Accessibility from Anywhere	Use of AI and Algorithms for Decisions; Can Be Hybrid (Online + Physical)	Multilingual Platform, Free of Charge, Maximum Duration 90 Days, Mediation Can Occur Offline	Three Global Platforms: Modria (Commercial), Cybersettle (Insurance), SquareTrade (eBay); Universities Offer ODR Courses

Conclusion

The comparative analysis of Online Dispute Resolution (ODR) frameworks and practices across selected countries reveals that while the global adoption of ODR has made substantial progress, its development remains uneven due to differences in legal infrastructure, technological capacity, and institutional readiness. Jurisdictions such as China, the European Union, and the United States demonstrate advanced and structured ODR systems, supported by comprehensive legislation, government initiatives, and technological integration, including the use of Artificial Intelligence (AI). Conversely, countries like Pakistan and Indonesia are still in the formative stages, facing challenges related to legal ambiguity, limited technical expertise, and low public confidence.

The study also finds that effective implementation of ODR requires more than technological readiness; it necessitates coherent legal frameworks, clear enforcement mechanisms, and strong institutional support to ensure fairness, transparency, and accessibility. Regional initiatives such as the ASEAN ODR Guidelines further highlight the importance of harmonization in cross-border consumer protection and dispute resolution. Ultimately, the integration of ODR into national and international legal systems represents not merely a technological transformation but a paradigm shift toward a more inclusive, efficient, and future-oriented model of justice in the digital era.

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