

CMA Annual Plan 2022/23 consultation

Summary of responses

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1. Overall summary

1. As part of our commitment to improve our understanding of the issues facing consumers, we continued with our increased level of engagement with business and consumer organisations for this year's Annual Plan consultation. We received 19 responses to our consultation from organisations across all four nations. In addition, the Competition and Markets Authority (CMA) organised numerous meetings and events with stakeholders across all four nations of the UK to discuss its overall plan and proposed themes. We are grateful for the feedback that we have received.
2. The formal feedback received during the consultation, alongside informal feedback received during discussions with stakeholders, has shown strong support for the themes set out in the CMA's 2022/23 draft Annual Plan.
3. The overwhelming majority of respondents supported the themes and were very positive about our plans going forward. There was broad support for the work we have already done in response to the Coronavirus (COVID-19) pandemic; the emphasis on digital markets and the plans and work already underway in this area; and work we are doing to promote healthy markets in sustainable products and services.
4. This document summarises responses according to the themes on which we consulted, along with general responses covering points unrelated to a specific theme or covering more than one theme. The organisations that responded to the consultation are listed at Appendix A.

2. Summary of general responses not linked to a specific theme

5. The overwhelming majority of respondents welcomed the main themes and are in broad agreement with the direction the CMA is heading, building on the strong action we have taken over the last two years, in relation to the restrictions arising due to the pandemic.
6. While respondents welcomed the focus on engaging with consumers, a number of respondents emphasised the importance of engaging with business, as well as consumers and other stakeholders, to understand markets and potential consumer harm and to educate to encourage compliance. One respondent asked that information from the Behavioural Hub be shared with businesses, and information on how consumers behave should be tested against business understanding, adding that this could also lead to businesses adjusting their behaviour without the need for enforcement action.
7. One respondent urged the CMA to step back from measuring success by reference to the amount it fines, or the number of enforcement actions taken, saying that enforcement means regulatory failure. They would also like to see more sustained engagement with businesses, as well as technology experts. They added that failure to engage could damage the UK's attractiveness as an international destination for business.
8. One respondent noted that small businesses need to be protected from exploitation by big business too, as they can often be in a similar position to consumers when dealing with large businesses.
9. A number of respondents mentioned the importance of recognising instances of potential detriment that will be unique to each region of the UK and the need to take action on these.
10. One respondent suggested adding a commitment to raising awareness and inspiring confidence from consumers by putting clear messages to the public that 'unfair business practices will not endure'.
11. Another respondent was concerned about the number of new functions being added to the CMA's role and the potential impact this could have on resourcing for existing functions.
12. One respondent noted that despite some signs of improvements in the Legal Service market (more firms providing more information on price, service, redress

and regulatory status to help consumers shop around), there has been a limited impact on the intensity of competition between providers since the Legal Services Market Study in 2016. They noted the rise in unregulated providers and the importance of better monitoring of such firms.

13. Several respondents suggested specific pieces of work (including follow-up work related to ongoing or past projects) for the CMA to carry out, such as work on subscription traps, dark patterns, fake reviews, social media endorsements, Google Sandbox, holiday cancellations, PCR testing, provision of public services by private companies (eg care services), the housing and private rented sector, parcel delivery, used cars, buy now/pay later, home technology market, energy efficiency home heating, electric vehicles and servicing of electric vehicles, circular economy, eco-labelling, Apple ATT system, supply chain disruptions, shipping costs, insurance premiums, late payment issues for small businesses, and holiday park contracts with owners.

The CMA's view

14. We thank respondents for their engagement with the consultation on our Annual Plan. We are pleased to see broad support for the themes we have proposed and welcome the specific input and suggestions from organisations across the UK.
15. It is vitally important to engage actively with consumers, businesses, organisations and other regulators, who play an important role in protecting consumers and promoting good practice. We agree we need to continue to engage even more widely with a broader range of stakeholders, across the nations and regions in 2022/23, and indeed internationally.
16. The CMA, as a UK wide body, is committed to delivering positive outcomes for consumers across the whole of the UK. With a growing presence in Scotland, Northern Ireland, Wales, and plans to open offices in Manchester and Darlington, we are continuing to develop our understanding of how different parts of the UK are affected by different issues. We will continue to ensure our recommendations reflect the different experiences of businesses and consumers, wherever they are located in the UK, as we did in our recent market study on Electric Vehicle Charging. We have also reached out to even more organisations through our work engaging with the third sector. We are committed to continuing our close co-operation with existing stakeholders and are looking forward to developing our relationships with new stakeholders.
17. Following our successful regional pilot engaging with businesses and others in the North West of England, we are currently evaluating the pilot, with a specific focus on digital markets and SMEs, and are looking to expand this work with

stakeholders across the North of England, to include both the North East and Yorkshire and Humberside. We will also extend our targeted engagement with business communities in Bristol and the surrounding areas.

18. We agree that engaging with business to raise awareness of competition and consumer law helps with compliance. In our campaigns work, we will continue to focus on getting clear messages out to consumers and businesses, with campaigns in areas such as misleading green claims and in the recent launch of our consumer focused 'Rip-off, Tip-off' campaign to empower consumers when shopping online.
19. We recognise the importance of balancing our existing duties with the new functions that we are in the process of establishing. We have worked hard to build strong foundations to prepare for our new responsibilities to ensure that we are effective in setting up and delivering the Office of the Internal Market (OIM), Digital Markets Unit (DMU) and Subsidy Advice Unit (SAU).
20. We note ACSO's statement that, despite some signs of improvements, there has only been limited impact on the intensity of competition. That is consistent with the finding in our [Review of the legal services markets study in England and Wales](#). We made a series of recommendations to improve consumer outcomes by increasing transparency, which were aimed at providing a high-level framework to be developed and overseen by the Legal Services Board (LSB) and implemented by the regulatory bodies. The LSB accepted our recommendations and we continue to take an interest in the steps that the LSB is taking and stay informed of the progress they are making.
21. We have noted the suggestions for specific pieces of work made by respondents, summarised in paragraph 13 above. Some of those suggestions will be taken forward as part of our follow up work on existing projects. We will evaluate all of the suggestions made in response to the consultation against our Prioritisation Principles as part of our pipeline of prospective work.¹

¹ [Prioritisation principles for the CMA \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

3. Protecting consumers

1. Respondents welcomed the CMA's commitment to continue protecting consumers from unfair behaviour by business, during and beyond the COVID-19 pandemic, in particular given the increased likelihood of consumers experiencing vulnerability.
2. A number of respondents emphasised the importance of focussing on the impact on vulnerable consumers, whether that is those in care homes, those made vulnerable due to rising cost of living or through digital exclusion. One respondent asked for a definition of vulnerability to be included in the plan, recognising that people move in and out of vulnerable positions. One respondent said that they commended the CMA for its previous in-depth research on consumer protections, in particular the research on vulnerability, and welcome its continued focus on ensuring markets work to the benefit of all in society.
3. Many respondents commended the work undertaken by the CMA in relation to the issues experienced by consumers as a result of the restrictions due to the pandemic, in particular the CMA's dedicated taskforce with respondents keen to see the CMA replicate this way of working in other areas.
4. One respondent encouraged the CMA to apply any lessons learned from some areas of work to other relevant sectors, such as applying lessons in the children's care market study to the experience of older people.
5. One respondent referred to the proposals laid out in the UK government's consultation on reforms to competition and consumer policy and the role that the CMA has in supporting not only these proposals, but also those relating to the wider regime, including proposals for alternative dispute resolution; an independent review of trading standards services; and updated consumer protections to tackle fake reviews and subscription traps.
6. A number respondents expressed their strong support for the introduction of fining powers for breaches of consumer law.
7. One queried how the CMA sees the relationship between the CMA's work and opt-out collective action, which is often a means for consumer redress, and whether the CMA intends to revisit its approach to confidential treatment of information gathered

The CMA's view

8. We welcome respondents' support for our continued focus on protecting consumers from unfair behaviour by business (both during and beyond the pandemic).
9. Supporting vulnerable consumers is an essential part of the CMA's job. We can all be vulnerable in certain contexts: if we need to make a purchase at a stressful time, for example, or feel under pressure to make a choice between different options that we do not fully understand. Some of us will experience vulnerability during particularly difficult periods of our lives, while for others vulnerability derives from longer term challenges, such as physical disability or protracted periods of poor mental health.
10. Effective consumer protection promotes trust in markets, which itself promotes recovery and growth, and we have an important role in protecting consumers (particularly those in vulnerable positions) from exploitation by large businesses with significant market power.
11. We will continue to engage with consumers and businesses, across each of the nations and regions of the UK, to seek to understand their needs as we deal with the ongoing impact of the pandemic which could lead to a rise in the number of consumers vulnerable to some form of exploitation. Increases in the cost of living, particularly for essential products and services, and the consequences for real disposable income, will limit the choices available to some consumers, leaving them more exposed.
12. Our response to the issues caused by the pandemic has demonstrated our ability to be agile and flexible as an organisation. We have learnt lessons from the experience and we will remain agile, engaging closely with consumers to understand any potential problems in markets as they arise, responding swiftly, where we can, to tackle the issue.
13. We remain of the view that stronger consumer protection law and stronger powers for the CMA would help to prevent and address more effectively some of the harmful practices that might arise as the economy recovers and adapts. We work closely with our colleagues in the wider landscape, including Trading Standards and Citizens Advice as part of the Consumer Protection Partnership to protect consumers from unfair business practices.
14. We recognise the role of follow on and collective opt-out actions in enabling consumers to seek redress. Publication of case closure announcements and decisions is a means of enhancing the visibility of the CMA's completed work, and of widening its impact. The CMA is committed to being open and transparent about the work it does and how it engages with those directly involved in or

affected by its work, while seeking to maintain (as appropriate) the confidentiality of information it obtains in the exercise of its functions. There are legal constraints on our ability to share confidential information. The approach we take to the treatment of confidential information is governed by the legal framework in Part 9 of the Enterprise Act 2002. This requires us to treat information provided to us during the course of exercising our functions as confidential unless a statutory gateway applies.

4. Fostering competition to promote long term growth across the UK

15. Respondents welcomed the CMA's commitment to fostering competition to promote innovation, productivity and long term growth across the UK
16. One respondent also commented on the need to remain internationally competitive given the UK's departure from the European Union and the impact of the pandemic on the economy.
17. A few respondents commented on the need to take account of the wider context in our investigations. One respondent said that as we emerge from the pandemic, other pressures and changes need to be taken into account in the assessment of mergers, market studies and inquiries. Another asked for continued reappraisal of our approach to analysing markets in the media sector, as it is vital to the sustainability of the press. Another said that the CMA should avoid a narrow view of markets in publishing, given the breadth of content and the variety of ways consumers access it. One respondent urged the CMA in its assessments to consider the importance of a strong venture capital market for tech start-ups, which grow to sell rather than scale.
18. One respondent also encouraged engagement with stakeholders and businesses at an early stage when possible emerging issues have been identified, in particular with a focus on engagement with businesses as well as consumers.
19. Another respondent sought further clarity on how consumer benefit will be measured and monitored. The respondent noted that how consumer benefit is measured should be linked to measurable consumer outcomes. While another said that detriment needed to be a factor in prioritisation, rather than just the number of complaints received. One respondent noted the importance of looking at regionally specific criteria for potential consumer impact.

The CMA's view

20. As outlined in the Annual Plan, we will focus on promoting competition and protecting consumers to encourage innovation, productivity, and sustainable economic growth, as the UK continues to deal with the ongoing impact of the pandemic.
21. We recognise the vital importance of remaining internationally competitive, given the UK's departure from the European Union (EU) and the ongoing impact of the

pandemic. Strong, competitive UK businesses stand the best chance of competing effectively in global markets. Weak competition harms the economy as a whole because firms do not face pressures to operate as efficiently as possible, the people employed by them are not as productive as they could be. Their machinery, buildings and other assets could be put to better use. Nor do they face the same pressures to innovate, in order to get ahead of their rivals. This inefficiency and lack of innovation comes at a cost to the economy as a whole, in the form of reduced job creation, weaker productivity and slower wage growth. In countries where competition is stronger, productivity and wage growth tend to be higher².

22. We will carefully assess mergers which could weaken competition, raising prices and reducing quality, innovation and choice, and address possible breaches of competition and consumer law.
23. We will continue to ensure that our investigations are informed by the real world context in which we live. We updated the Merger Assessment Guidelines in 2021 to reflect the fact that markets had evolved and changed at a rapid pace. Building on recommendations made by the Furman and Lear reports in 2019 on how the CMA should approach its assessment of digital mergers, the updated guidelines reflect the legal framework within which the CMA undertakes merger assessments and were updated to take account of the CMA's recent experience and case law.
24. The CMA is aware of the pressures which the pandemic caused for a number of businesses and the economy as a whole. We worked closely with government to relax competition law where appropriate and to provide guidance on the CMA's approach to essential business cooperation during the height of the crisis. We adapted our investigative procedures, as necessary, to take account of the difficulties businesses faced at the height of the pandemic.
25. We will continue to engage carefully with all interested parties throughout an investigation to gather information, from the early stages prior to official launch, where that is possible, right through to consideration of any final remedies. This enables us to gain a strong understanding of the context in which they operate, including gathering information and views from the businesses directly involved, other affected businesses, customers and other interested third parties.

² Bravo-Viosca, A. and Criscuolo, C., (2010), 'Evidence on business growth dynamics', presentation and paper for the OECD Working Party on Industry Analysis, 8-9 November 2010; CMA (2015) Productivity and competition – a summary of the evidence.

26. We assess the direct financial benefit to consumers on a rolling annual basis. Our most recent assessment calculated direct annual savings of at least £2 billion in 2020 to 21. Over the 3-year period between 2018/19 and 2020/21, the estimated direct financial benefit to consumers was over £7 billion ie, for every £1 we spent on our operating costs, the average benefit to consumers over the last 3 years was £25. This is likely to be conservative as an estimate, as it excludes a number of cases where benefits are difficult to quantify and it excludes the many wider benefits of our work on productivity, innovation and growth, as referenced above.
27. We agree that consumer detriment should be a factor in our prioritisation decisions. As set out in our prioritisation principles, we therefore focus our efforts and resources on deterring and influencing behaviour that poses the greatest threat to consumer welfare, and intervene in order to protect consumer welfare and, in the process, drive higher productivity growth. Consumer welfare includes better value for consumers in terms of price, quality, range or service, both static and dynamic, and may also include non-financial detriment such as the avoidance of physical harm or emotional distress. We may prioritise work because the direct effects would specifically benefit disadvantaged consumers. We also consider indirect effects on welfare through improved awareness for consumers, business and government, as well as wider impacts on economic efficiency and the wider economy. We aim for a balanced portfolio of cases, which includes large cases, where the impact is felt across all consumers in the UK, and smaller cases, where the impact may be felt particularly acutely by a subset of consumers in a specific location or with particular disadvantages.

5. Promoting effective competition in digital markets

28. Respondents welcomed the commitment to promoting effective competition in digital markets particularly within the context of the new DMU.
29. Respondents were very positive about the pace with which the CMA had moved in developing the thinking about digital regulation, with one commenting that the Digital Advertising Market Study was regarded internationally as the defining work on this problem. However, a few respondents were concerned that without the legislation to give the DMU the powers it needs, we are falling behind our international counterparts, with the risk that there will be pressure to come into line with these powers to avoid having multiple different regimes in different countries, even if that proposed regime is not as effective.
30. A number of respondents referred specifically to the role and powers of the DMU. One respondent emphasised the importance of streamlining and avoiding delays in designating SMS status. A number of respondents were concerned about the impact of dominant digital platforms on news publishers' ability to earn a fair return for their content. Another, the need for the DMU to have the power to act to prevent or address consumer harm in digital markets, where it is in the interest of consumers to do so, regardless of whether there is a competition issue. One respondent stated that online retail should be seen as part of retail, not as a subset of a wider digital market.
31. A few respondents commented on the need to take account of digital exclusion and urged the CMA to identify measures to improve accessibility, service experience and outcomes. They said that engagement with a wide range of industry stakeholders and consumers would be required to ensure the challenges that result from digitalisation are identified and resolved to help consumers. Another noted that with digital markets changing quickly, there is an increased risk that some groups will be left behind and this is particularly important if such consumers are also more likely to be in vulnerable circumstances. One respondent said that the CMA should investigate issues arising from reduced digital literacy and sight impairments, including holding digital firms to account when these consumers are not adequately accommodated.

The CMA's view

32. As outlined in the Annual plan, the CMA is working closely with the UK government on the design of the new pro-competition regime, following the consultation on proposals. We look forward to receiving the new powers and have already launched the shadow DMU to focus on operationalising and preparing for the new regime. The non-statutory DMU will work to maximise

operational readiness for the DMU in time for the implementation of legislation. This will include building teams with the relevant capabilities and preparing draft guidance; supporting and advising the government on establishing the statutory regime; evidence-gathering on digital markets, where the CMA will continue to use its existing powers, where appropriate, to investigate harm to competition in digital markets; and engaging stakeholders across industry, academia, other regulators and government. The DMU will build close relationships with a range of stakeholders to ensure diverse insights underpin the new regime. In particular, it will work closely with regulators, both domestically through the Digital Regulation Cooperation Forum (DCRF), and internationally, to strengthen cooperation and promote greater coherence across regulatory approaches.

33. In the meantime, we continue to use our existing tools to address problems in digital markets. This includes our work investigating mergers that have the potential to lead to a substantial lessening of competition in digital markets, such as the review of the Facebook/Giphy, and Adevinta/eBay mergers. We will continue to progress our portfolio of competition enforcement cases investigating issues in digital markets. We will also continue with our focus on consumer enforcement in digital markets, building on our work in areas such as fake reviews, social media endorsements, online gambling, and secondary ticket platforms. We will look to prioritise other new cases in the digital sector, assessing these against our prioritisation principles.

34. We recognise the problem of digital exclusion and limited digital capabilities and the impact this has on people's ability to engage in modern markets. This can be particularly acute for older consumers. In our energy market investigation, we found that just over 50% of the people who had been on the expensive default tariff for more than three years either did not have access to the internet or did not feel confident using price comparison websites. As indicated above, supporting vulnerable consumers is a key part of the CMA's role. We want to ensure all consumers can exercise informed choice and have access to what they want at the best possible price.

6. Supporting low carbon growth

35. The CMA's commitment to support the transition to low carbon growth and the work we have already done in this area, such as the misleading green claims work and our market study on electric vehicle charging was welcomed by respondents.
36. Respondents generally suggested building on this work by undertaking more work, with one suggesting work on green terms, such as how labelling on net zero goods could be made clearer for customers; ensuring we are joined up with the Advertising Standards Agency (ASA) on this work; and noting that it is often smaller, offshore businesses that are the problem, not the larger reputable brands.
37. Respondents also called for more help for businesses in complying with competition law, when developing initiatives and encouraged the CMA to monitor new and rapidly developing markets that are growing in response to the governments net zero commitments. They urged the CMA to be clear that we do not want to discourage businesses from trying to make sustainable products. Another, that the CMA remain vigilant as to any collusion that may take place under the guise of environmental standards.

The CMA's view

38. We welcome the supportive comments received in relation to this theme. We recognise that there is more to do to help businesses and consumers navigate the challenges that come with the developments in this area.
39. We want to make sure that the competition and consumer enforcement regimes are able to play their part where possible in achieving the UK's Net Zero and environmental sustainability goals. We are continuing to expand our capability to ensure that when delivering our functions, we act in a way which supports the transition to a low carbon economy.
40. As set out in the [Annual Plan](#), paragraphs 2.49 – 2.50, we have produced an information sheet to help businesses and trade associations better understand how competition law applies to sustainability agreements and where issues may arise. We have also published a green claims code to help businesses comply with the law and prevent people being misled by environmental claims.
41. We do not want to discourage businesses from selling environmentally friendly products and services. We want to encourage healthy markets in sustainable products and services, where businesses can innovate to produce sustainable

products and services and consumers can trust the information provided to them and make an informed choice. We will remain vigilant and will take action, where constructive cooperation tips over into unhealthy anticompetitive practices.

42. We will build on the work we have already done to raise awareness of misleading green claims and continue to monitor markets, such as electric vehicle charging, by following up on our recommendations to UK governments in that market study report. We will continue to prioritise cases where practices could impede the transition to a low carbon economy.

7. Delivering on our new responsibilities

43. Respondents generally emphasised the importance of engagement with external stakeholders in delivering the CMA's new responsibilities to ensure that our new functions are clear and well understood by consumers and business across the four nations of the UK. Respondents welcomed the commitment to continuing our engagement with other authorities across the consumer and competition landscape.
44. Respondents broadly welcomed the CMA's cooperation with other international authorities. One emphasised the importance of doing this at an early stage in the investigation to ensure decisions were delivered in parallel. Another emphasised the importance of a close working relationship with EU competition and consumer protection networks.
45. One respondent noted the important role the CMA has to support government in ensuring trade deals deliver meaningful consumer benefits, including greater choice, availability and affordability; maintaining consumer protections; and exploring options to enhance reciprocal consumer rights and enforcement with trading partners.
46. One respondent commented on the need to improve understanding of how the new responsibilities protect consumers and use appropriate metrics to track effectiveness. Another asked for guidance to help stakeholders identify what may fall within OIM's remit and how the CMA would assess differences in approaches to business regulation in the four nations, including assessment of unintended consequences. With regard to the SAU, one respondent hoped that it would be possible for the government to provide targeted support to businesses, which would not have been permitted under the EU scheme.
47. A number of respondents commented on the importance of join up between UK regulators. One highlighted the uncertainty created by overlapping investigations by FCA and ICO or CMA and FCA. Another suggested that the CMA should work with government and sectoral regulators to reduce the likelihood of appeals and improve the regulated network sector appeals processes. In particular, the CMA should be seeking a more coordinated regulatory approach to components of the allowed rate of return.
48. Respondents also commented on the need to balance those new functions with the CMA's existing responsibilities.

The CMA's view

49. We will continue our close engagement and cooperation with a range of partners, both within the UK and internationally, on a wide variety of issues. With markets becoming increasingly global and the growth of digital markets mentioned above, different jurisdictions face many of the same challenges. As noted in our Annual Plan, we consider it is even more important for us to forge strong relationships across the world, and work with partners in order to protect consumers within and outside the UK.
50. As indicated in the plan, we engage closely with counterparts in other jurisdictions, launching cases in parallel with appropriate. For example, we have launched an investigation into the merger between [Cargotec Corporation and Konecranes plc](#) in parallel with other authorities, including the European Commission, the Department of Justice and the Australian Competition and Consumer Commission.
51. We agree that strong, independent competition and consumer protection law enforcement also has an important part to play in international trade agreements that the UK may enter into, ensuring that businesses from both parties can compete fairly to the benefit of consumers. We will continue to work closely with the UK government as they put strong new trade relationships in place with key partners
52. The CMA will continue to strengthen existing relationships with other UK regulators and build new ones. We work closely with our fellow regulators as part of the UK Regulators Network and the UK Competition Network. The economic regulators are working together to consider where there may be scope to achieve greater consensus on the approach to setting the allowed rate of return, via a taskforce supported by the UK Regulators Network. We have agreed to provide input to this work.
53. In July 2020 we launched the Digital Regulation Cooperation Forum, alongside Ofcom and the Information Commissioner's Office, to support closer cooperation across our work on digital markets. The CMA's work in this area has already been influential in shaping discussions in the UK and more widely. In May 2021, the CMA and the ICO published a joint statement setting out their shared views on the relationship between competition and data protection in the digital economy. In November, the Digital Regulation Cooperation Forum (DRCF) has launched a technology horizon scanning programme, to provide a coherent view of new and emerging digital markets and technologies.

54. We will continue to strengthen these relationships while also delivering our new functions. We recognise the challenges that we face as we embrace our new expanded role. Our extensive preparations have ensured that we have the necessary people, skills and infrastructure in place to carry out our expanded role outside the EU, while continuing to deliver our existing responsibilities. The OIM is now in place, as is the DMU (in shadow form) and we are in the process of developing and preparing for launch the SAU. These will be key priorities as outlined in the Annual Plan for 2022/23.
55. The CMA has already published guidance on how the OIM will carry out its functions in support of the effective operation of the UK internal market. As indicated in the Annual Plan, the SAU will have a role in monitoring and reporting on the overall functioning of the new subsidy control regime, as well as providing non-binding advice to public authorities on a small number of individual subsidies and schemes that are most likely to have distortive or harmful effects. It will allow public authorities to obtain an objective view on their assessments before granting a subsidy, while ensuring they can act swiftly and do not suffer unnecessary delays. We will continue to publish any relevant guidance as our functions and powers develop.
56. We are grateful for the comments we have received in response to the Annual Plan consultation and we remain open and ready to engage with and listen to businesses, consumers, third sector organisations and other interested parties who may have more specific queries or concerns regarding the CMA's new functions or the exercise of our current ones.

Appendix A: List of formal respondents

1. Advice Direct Scotland
2. Association of Consumer Support Organisation
3. British Retail Consortium
4. Citizens Advice
5. Consumer Council (Northern Ireland)
6. Consumer Scotland
7. DMG Media
8. Experian
9. Hausfeld & Co LLP
10. Holiday Park Action Group (C.O.A.T Limited)
11. News Media Association
12. Older Peoples Commissioner (Wales)
13. Ombudsman Service
14. Professional Publishers Association
15. SCOTSS
16. Shelter Cymru
17. techUK
18. UK Lubricants Association Limited
19. Which?