

From: [REDACTED]
Sent: 26 August 2022 10:23
To: [REDACTED]
Cc: [REDACTED] BrowsersAndCloud
Subject: Re: Ecosia Response to CMA's Proposed Market Investigation on Mobile Browsers and Cloud Gaming

Overview

- Ecosia is the search engine that plants trees. A tech company that 'puts people and planet before profit', we dedicate 100% of our surplus revenue to climate action, with at least 80% financing tree-planting projects around the world - including in the UK where we have planted thousands of trees near NHS hospitals to support staff and community well-being.
- Ecosia's search results and search ads are powered by Bing. As part of Bing's syndicated partner network, Ecosia uses Bing's search capabilities and technology enhanced with Ecosia's own algorithms to create a sustainable revenue stream with paid ads to fight climate change.
- By offering our 20 million users a green alternative to search and browse online, we have been able to plant over 155 million trees in biodiversity hotspots in over 32 countries, in places around the world where they can have the biggest impact.

Response:

- As an alternative search engine that has long advocated for regulation and the enforcement of rulings that could meaningfully improve the market share of alternative competitors for the benefit of consumers and innovation, we welcome the CMA's interest in launching a market investigation into Apple and Google's power over mobile browsers.
- Notwithstanding, in order to truly hold the large tech companies in question to account and develop policies and regulations that have the potential to effectively restore fair competition, including creating a level playing field in the search market, we urge the CMA to extend the scope of the investigation to **include both mobile and desktop browsers**.
- We believe that desktop should become part of the CMA's investigation for two reasons: a) in most cases desktop is more commercially relevant than mobile ; b) desktop search engine market share is equally linked to the function of dominant positions in operating systems and browsers and c) a number of pervasive anti-competitive behaviors, including so-called 'dark-patterns' hinder user acquisition, retention and ultimately growth with browsers nudging users of alternative search engines away to gatekeeper's own search service.

In order to remedy the above mentioned dark-patterns, the CMA should consider the following areas of focus with regards to desktop (subject to the scope of the investigation being widened):

(a) Default settings and choice screens:

- We strongly believe that a search preference menu **on both mobile and desktop browsers** would be extremely effective in delivering real consumer choice and bringing competition into the market quickly.
- Choice screens remain the best of all measures currently under consideration by regulatory authorities across mobile and desktop and should be made available on all Google/Apple-dominant platforms, including Chrome and Safari on desktop.
- For this reason, together with other alternative search engines, we have developed **10 Principles for Fair Choice Screens and Effective Switching Mechanism** as published in this joint statement which we would be grateful for the CMA to consider in the context of this investigation.

(b) *Extensions* and plug-ins:

- Extensions and plug-ins are vital to allowing third-party developers to create specific functions, to easily add new features, and to expand functionality for users browsing the internet.
- Assuring access to extensions and plug-ins on desktop is fundamental to this business model for a number of reasons: a) they provide a simple, and the most widely used way, for consumers to switch search engine; and b) unlike other acquisition channels, it is possible to acquire users without having to pay onerous revenue share fees.
- However, in recent years, a number of dominant browsers have either threatened to remove extensions and plug-ins, or in some cases have already started to do so.
- Given the centrality of extensions and plug-ins to competition in the online search market, we urge the CMA to broaden the scope of its investigation to this area and consider mandating the continuation of browser extensions and plug-ins so as to prevent gatekeepers from removing access to this vital infrastructure for competition.

