



Empowering consumers away from their desk: a call for competitive and fair market conditions for mobile browser extensions

Introduction

We write to you on behalf of a diverse group of organisations that support greater choice and innovation for the web. The signatories include browser extension providers, browser vendors, app and web developers. While many of them are harmed directly by the issues discussed in this submission, others are motivated by a need for a thriving and fair online ecosystem where user choice prevails.

We commend the Competition and Markets Authority (CMA) for its excellent work to date in shining a light on the broken mobile browser market. The CMA has correctly identified that the dominant incumbents in the mobile browser market put structures in place which limit competition, block innovation, and protect the status quo.

Competition on desktop vs mobile

Although not perfect, it is generally recognised that the market for browsers on desktop is much healthier than on mobile. The CMA no doubt reached this conclusion when deciding to limit the scope of its market investigation to web browsers on mobile devices.

There are three key differences between the nature of competition on desktop and mobile that are behind this differing outcome:

1. On desktop, web browsers are free to build from any browser engine of their choice, regardless of the operating system or device that they are shipped on.
2. Pre-installation and default settings are more prevalent and more powerful on mobile devices.
3. Browser extensions are widely available and popular on desktop, providing a low-cost route of entry as well as adding features of quality and innovation to existing browsers. Support for extensions on mobile is more limited.

While the first two points have been identified and analysed from the outset of the market investigation, the third problem on mobile related to browser extensions has not. We are therefore pleased to see that the CMA has now begun to recognise the significance of this issue, as set out within Working Paper 3.

Browser extensions are blocked on mobile

As the CMA has rightly identified, limited support for browser extensions on iOS and Android devices is simultaneously harming consumers and developers, while protecting only the interests of Apple and Google.

Consumers are missing out on innovative new features and services that can enhance their browsing experience, whether that is helping them get the best deal, learning a new language, improving their writing, blocking or filtering intrusive ads, controlling their data, or protecting their privacy or security. This harm is not hypothetical or a potential outcome - we know that consumers are missing out on these services because they already exist uninhibited on desktop and on certain mobile browsers, and they are used by millions of people all around the world.

Businesses are also being harmed in a number of ways:

- First, potential entrants into the mobile browser market are missing out on a low-cost route of entry that allows them to test the market and try out a new browser feature or model before investing heavily in building a browser from scratch.
- Second, browser extension providers are banned from shipping their products to certain browsers where many consumers spend the majority of time online. For many this will mean a limit to how far they can grow, while for others it will have forced them to pivot and find a new way to reach a broad cross section of consumers on mobile.
- Third, app and web developers are missing out on another potential route for distributing their products or services beyond native and web apps. Browser extensions have many similar positive attributes to web apps in how they can be available across different operating systems, and in not being captured by stifling app store commissions.

When small businesses are constrained by additional costs or barriers to innovation, it is always ultimately consumers that pay the penalty. This harm cannot be allowed to continue unabated.

Urgent action is needed

We congratulate the CMA for being the first regulator in the world to identify and diagnose this issue, just as it was with the WebKit requirement and associated restrictions on web apps. We urge you to now take the necessary action to address this related issue and finally release the full innovative potential of mobile browser extensions.

While we agree with the CMA's concluding paragraph in WP3 that limited support for browser extensions is a symptom of weak competition between browsers in each ecosystem, the reverse impact is far stronger. Weak competition between browsers on mobile is a symptom of deliberate choices to restrict distribution of mobile browser extensions. A thriving and competitive ecosystem for the web on mobile will not be achieved unless these restrictions are lifted.

We all stand ready to provide any evidence or feedback that could assist you in designing and implementing the necessary remedies to bring browser extensions to all users on iOS and Android.

Submission signed by the following market participants

Organisation	Description
AdGuard	Browser extension provider, app developer
Adnauseam	Browser extension provider, app developer
CitizenMe	Browser extension provider, app developer
Coalition for Online Data Empowerment (CODE)	Non-profit industry coalition
DataPal	App developer
DataSapien	Browser extension provider, app developer
Ecosia	Search engine, browser vendor, browser extension provider
eyeo	Browser extension provider, browser vendor
faircado	Browser extension provider
Gener8	Browser extension provider, browser vendor, app developer.
Ghostery	Browser extension provider
iconomy	Startup capacity builder, investor
Internet Economy Foundation (IEF)	Think Tank
JLINC Labs	Technology provider
LanguageTool	Browser extension provider, app developer
Mate translate	Browser extension provider
Quillbot	Browser extension provider, app developer
Qwant	Search engine
Rita Data	Browser extension provider, app developer
saas.group	App developer