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Competition and Markets Authority

Digital Markets Unit
Browsers and Cloud Team

Your contact person

[Redacted contact information]

13.12.2024

About eyeo

eyeo is dedicated to empowering a balanced and sustainable online value exchange for users, browsers, advertisers, and publishers. By building, monetising, and distributing ad-filtering technologies, we create solutions that allow all members of the online ecosystem to prosper. Our ad-filtering technology powers some of the largest ad blockers on the market, like Adblock Plus¹ and AdBlock², an Android mobile browser³, and is distributed through partnerships to millions of devices. There are currently 350 million global ad-filtering users, and ~6 million in the United Kingdom, who see nonintrusive advertising that is compliant with the independently established Acceptable Ads Standard.

We appreciate the Competition and Markets Authority's (CMA) commitment to ensuring fair competition in the mobile world and fostering a transparent business environment on mobile devices and welcomed the CMA's market investigation. So far, we tried to bring in our perspectives in dialogue with the authority:

- Given our active and unique role in the online advertising ecosystem, we submitted a response⁴ to the CMA's issues statement⁵ in February, providing our

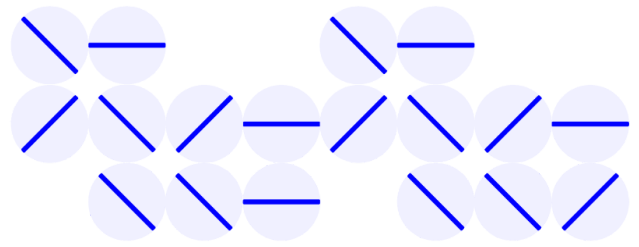
¹ [Adblock Plus](#)

² [AdBlock](#)

³ [Adblock Browser](#)

⁴ [Supplemental submission on the issues statement - eyeo](#)

⁵ [Mobile browsers and cloud gaming market investigation - Statement of Issues](#)



insights and expertise, and bringing forward some issues that have not been explicitly discussed yet.

- Following the publication of the different working papers in June 2024, we provided observations⁶ on the working paper 3, entitled “Access to browser functionalities within the iOS and Android mobile ecosystems”⁷. Concretely, we commented on the chapter discussing the limited support for browser extensions on iOS and Android.
- We also co-signed an open letter⁸ together with a diverse group of 20 organisations that support greater choice and innovation for the web. The signatories (including browser extension providers, browser vendors, app and web developers) urged the CMA to take the necessary action to address the competitive issues related to the lack of mobile extensions in order to finally release the full innovative potential of mobile browser extensions.

We would like to offer specific comments on the issues related to browser extensions discussed in chapter 6 (“Browser extensions”, pages 262-271)⁹ of the CMA’s provisional decision report. We are convinced that our extensive experience with browser extensions provide a valuable perspective. This does not diminish the value of the CMA’s other work and proposed remedies in the Provisional Decision Report, which we commend.

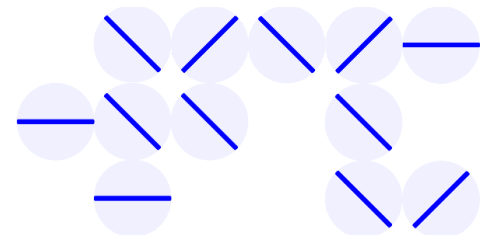
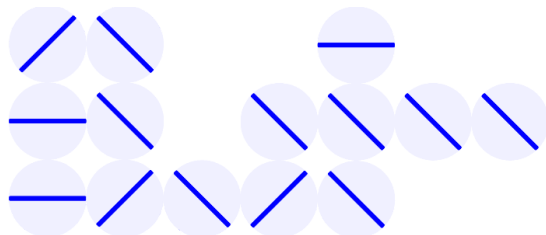
In particular, our feedback is structured as follows: First, in-depth comments are provided to chapter 6 (“Browser extensions”) of the CMA’s provisional decision report. Second, we share concerns related to the missing equivalence of access and adverse effects on competition, provide observations related to consumer welfare and conclude by discussing the interplay between the market investigation and the Digital Markets, Competition and Consumers Act 2024.

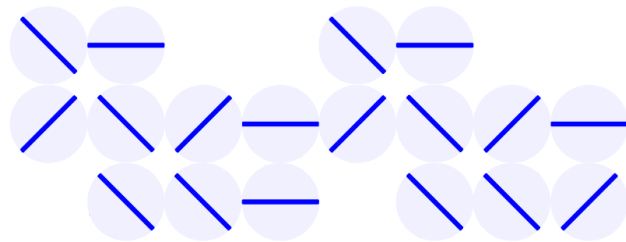
⁶ [eyeo response to WP 3](#)

⁷ [WP3: Access to browser functionalities within the iOS and Android mobile ecosystems](#)

⁸ [Open letter “Empowering consumers away from their desk: a call for competitive and fair market conditions for mobile browser extensions”](#)

⁹ [Mobile Browsers and Cloud Gaming - Provisional Decision Report](#)





Browser extensions

As mentioned in previous submissions, we appreciate the focus the CMA has put on the limited support for browser extensions on iOS and Android mobile devices and the related impact on competition in mobile browsers on iOS and Android, as well as the implications for browser extension providers, developers and users. In the following, we provide our perspectives following the same structure the provisional decision report provides in chapter 6.

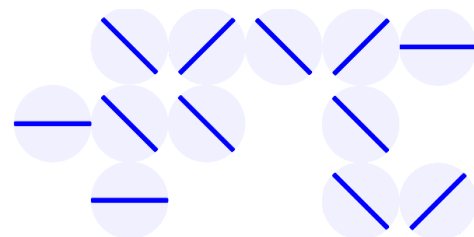
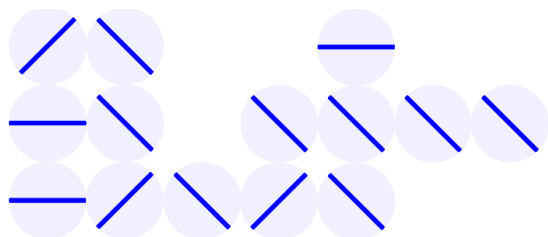
Sub-section 2: Overview of the evidence received on the extent of support for browser extensions on both iOS and Android

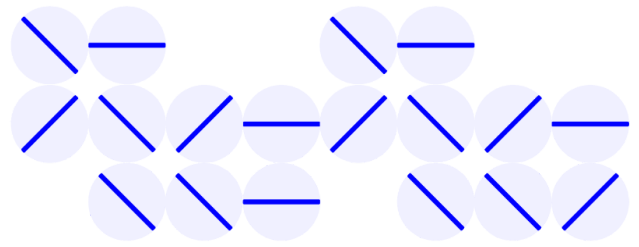
Paragraphs 6.3 - 6.8 summarize the evidence the CMA has received on the limited support for browser extensions on iOS and Android.

We appreciate the dedication of the CMA to emphasize some of the concerns raised. Still, we were surprised to see that the aforementioned open letter from 20 organisations that support greater choice and innovation for the web was not mentioned in sub-section 2 of chapter 6. The co-signatories of the letter made it clear that “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”¹⁰. We feel that including the points raised in the letter would appropriately reflect the concerns raised by these browser extension providers, browser vendors, app and web developers, since they are clear evidence on the limited support of browser extensions on both iOS and Android.

We also noted that almost all evidence provided, and all reasons given, from Google on the issue of support for browser extensions on Android was redacted (paragraph 6.6(a)). We are not unaccustomed to this approach, since Google’s statements related to

¹⁰ [Open letter “Empowering consumers away from their desk: a call for competitive and fair market conditions for mobile browser extensions”](#) (page 2)





the limited support of browser extensions on Android as part of working paper 3¹¹ were redacted as well. The lack of publicly available evidence from Google prevents a thorough discussion of the adverse effects on competition. We urge Google and/or the CMA to make its evidence public, enabling all interested parties to engage in a fact-based discussion of the provisional findings regarding the level of support for browser extensions.

In addition, we would like to point out the only sentence from Google related to the support for browser extensions on Android, which has not been (partly) redacted: “Google submitted that as of 30 July 2024, it had not prioritised the development of browser extensions on mobile, as it has not viewed this as an important feature for mobile browsers” (paragraph 6.6(a)). We were confused by this claim, since in early October 2024, multiple outlets reported that Google is planning to support extensions on Chrome for Android, aimed at some mobile devices such as Chromebooks¹²¹³¹⁴. This development seems to stand in contrast to the claims made that browser extensions are not an important feature for mobile browsers. In addition, this development shows the technical feasibility of bringing extensions to users, regardless of the device. At the same time, it is worth noting that Google continuously highlights the benefits of extensions on desktop. Google promotes desktop extensions as a huge success, arguing that “there are now more than 180,000 extensions in the Chrome Web Store, and nearly half of Chrome desktop users actively use extensions to customize Chrome and their experience on the web”¹⁵, and stating that “unique and creative Chrome extensions [...] help with everything from productivity to accessibility on the web”¹⁶. We cannot follow the argument that such a success story on desktop would not be regarded as an “important feature” on mobile. Instead, as argued before¹⁷, one can surmise that

¹¹ [WP3: Access to browser functionalities within the iOS and Android mobile ecosystems](#) (page 31)

¹² [Android headlines: Chrome browser app for Android may get extensions support](#)

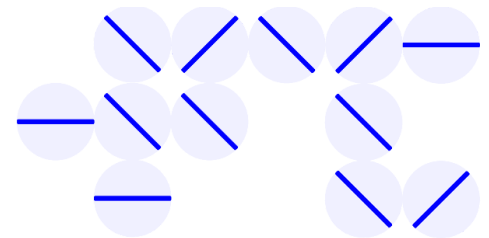
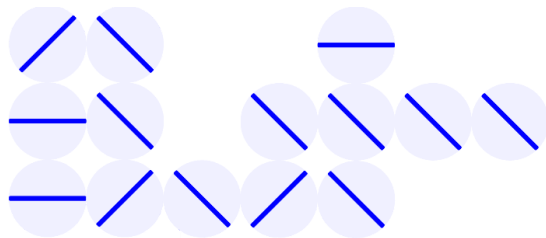
¹³ [Android police: Google Chrome for Android could finally support your favorite extensions from desktop](#)

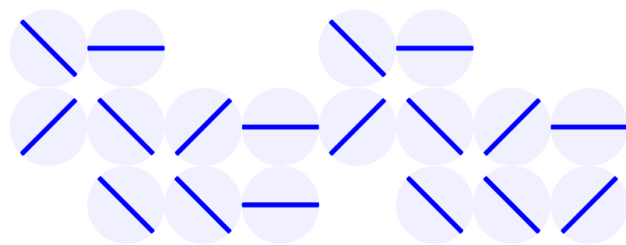
¹⁴ [Chrome Unboxed: Chrome for Android may get extension support, but it's likely not what you think](#)

¹⁵ [Chromium blog](#)

¹⁶ [Google blog](#)

¹⁷ [eyeo response to WP 3](#) (pages 7-8)



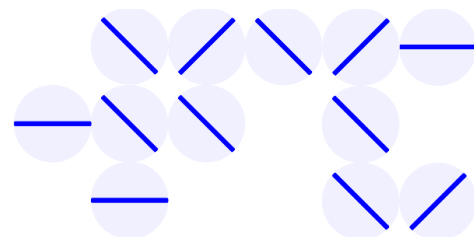
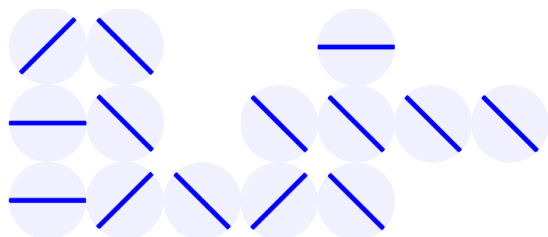


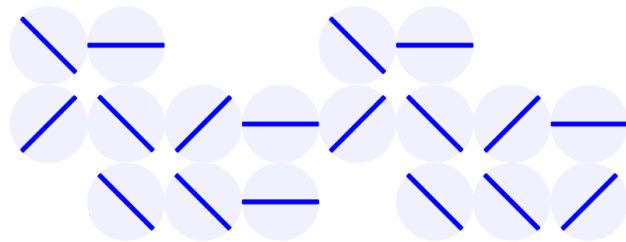
Google made the deliberate choice against the support for mobile extensions to solidify its own market power on mobile, significantly limiting benefits and choice to users and opportunities for developers, thus creating adverse effects on competition. Indeed, the only difference between desktop and mobile appears to be that extensions were needed to respond to competition on desktop, whereas they could be held back from consumers in relation to mobile because of the position of the Android OS.

Sub-section 3: Assessment of the potential impact that limited support for browser extensions has for competition in mobile browsers

Sub-section 3 considers two implications of limited support for browser extensions. First, it is discussed whether “browser extensions provide a potential entry route into mobile browsers, and therefore whether limited support for extensions could increase barriers to entry into mobile browser markets” (paragraph 6.9(a)). The provisional decision report summarises some arguments provided, including that “[s]everal third parties submitted that browser extensions could act as an entry route into mobile browsers for developers, and therefore that the limited support for extensions on mobile platforms increases barriers to entry” (paragraph 6.12). Among others, the aforementioned open letter of 20 organisations is referred to. In the following paragraph, the provisional decision report claims that “evidence from developers has not substantiated these submissions” (paragraph 6.13). We were confused by this conclusion, given that the 20 organisations that co-signed the letter include a variety of developers. We would appreciate it if the CMA could clarify this seeming contradiction.

In addition, the provisional decision report states that “[s]everal extensions developers described [...] that limited support for browser extensions on mobile has required them to develop a standalone mobile browser as an alternative distribution channel for their products” (paragraph 6.13). From our perspective, this precisely describes the adverse effects on competition: because developers cannot offer browser extensions on mobile, they are forced to develop a standalone mobile browser as an alternative distribution channel, which is significantly more burdensome, resource-intensive and complex. Rightfully, the CMA highlights that “Ghostery stated that it has to invest





significant efforts and resources to have its own browser” (paragraph 6.13(a)). Extension developers are often small- and medium-sized companies that could never bear the expenses and investments needed to develop a standalone mobile browser, let alone a successful monetization, which is exactly why we and others have been repeatedly calling for the necessary remedies to bring browser extensions to all users on iOS and Android.

Additionally, paragraph 6.14 refers to browser vendors who were asked if they consider browser extensions to be an entry route into mobile browsers. Paragraph 6.14(b) mentions that “Google stated that it was not aware of any browsers that first started as extensions”. We want to make it clear that eyeo’s flagship product, Adblock Plus¹⁸, started as an extension and based on the ban of mobile extensions on Chrome for Android, we were not able to distribute our extensions on mobile and instead developed Adblock Browser¹⁹ as a mobile browser. Hence, we want to make the CMA, relevant parties, and the public aware of a mobile browser (Adblock Browser) that first started as an extension (Adblock Plus)²⁰.

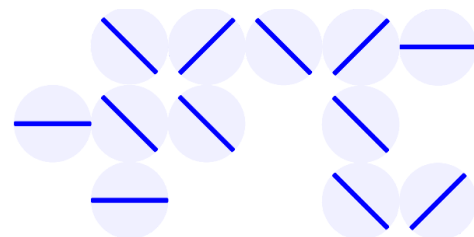
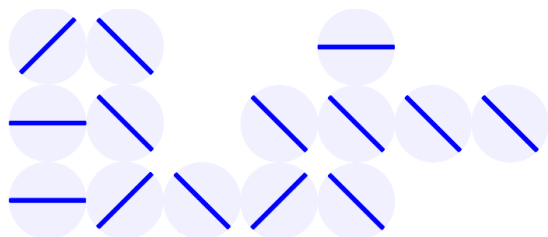
In this context, we have experienced first-hand how browser extensions could have been an entry route into mobile browsers, if they were allowed on Chrome for Android, and urge the CMA to include our perspective as the vendor of Adblock Browser in the context of paragraph 6.14.

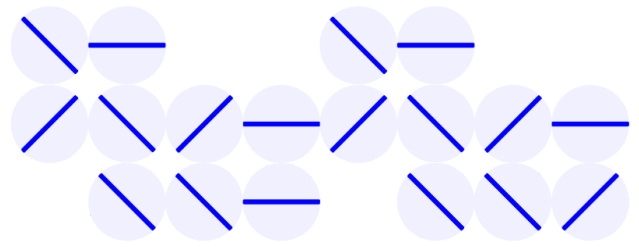
Lastly, sub-section 3 concludes its assessment of the first implication of limited support for browser extensions by stating that “there is limited evidence that browser extensions could act as an entry route into mobile browsers for developers” (paragraph

¹⁸ [Adblock Plus](#)

¹⁹ [Adblock Browser](#)

²⁰ Interestingly enough, based on the ban of mobile extensions on Chrome for Android, we also tried to offer an Android app that has been promptly removed from the Google Play Store - speaking of entry barriers and adverse effects on competition. See, for background, for instance [Electronic Frontier Foundation: Google Takes the Dark Path, Censors AdBlock Plus on Android](#), or [Venture Beat: Google yanks Adblock Plus from Google Play](#), or [TechCrunch: AdBlock Plus Responds To Play Store Ban: “Unilateral Move By Google Threatens Consumer Choice”](#)



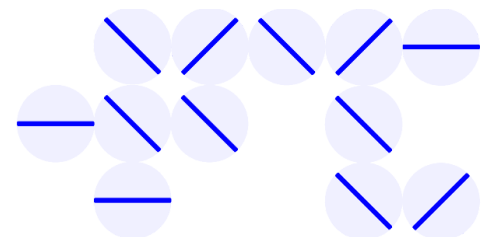
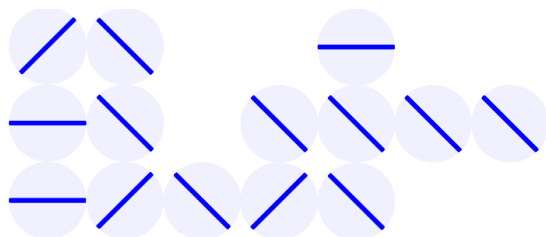


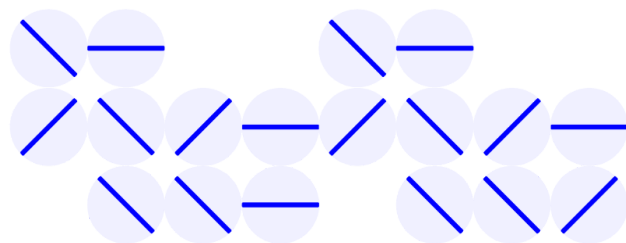
6.15). We hope our points raised above make the evidence clear how browser extensions could act as an entry route into mobile browsers for developers. Additionally, the CMA states that they “have not seen evidence [...] that browser extension providers have plans to enter mobile browsers that are being restricted as a result of the limited support for extensions on mobile platforms” (paragraph 6.15). It seems that this conclusion ignores the aforementioned open letter of 20 organisations, including several browser extension providers, who urged the CMA to implement necessary remedies to finally release the full innovative potential of mobile browser extensions. eyeo, as one of the leading browser extension providers and co-signatories of the open letter, would be eager to enter mobile browsers through extensions, especially Chrome on Android, if the ban of mobile extensions would be lifted.

Second, sub-section 3 discusses whether the lack of support for browser extensions constitutes evidence of weak competition in mobile browsers (paragraph 6.9(b)). Rightfully, the provisional decision report summarizes how the limited support for browser extensions on iOS and Android negatively impacts developers. The CMA discusses how developers cannot utilize mobile extensions as a distribution channel, forcing them to invest in developing new browsers or apps, or miss out on the mobile market entirely (paragraphs 6.16-6.17). Then, the report continues to explore how the lack of mobile browser extensions negatively impacts consumers by reducing their access to additional functionality and choice. Relevant examples are illustrated, which explain how consumers miss out on features, services and functionality and how the restrictions on mobile browser extensions not only stifle innovation, but harm consumers (paragraph 6.18). Finally, the CMA concludes sub-section 3 by confirming that “[t]he evidence above shows that limited support for browser extensions on mobile has a negative effect on developers who miss out on a distribution channel for their products, and on consumers who miss out on additional functionality and choice” (paragraph 6.19). We strongly agree with this conclusion.

Sub-section 4: Provisional conclusion on support for mobile browser extensions on iOS and Android

Sub-section 4 concludes the chapter 6 (“Browser extensions”, pages 262-271) of the CMA’s provisional decision report and provides the CMA’s provisional conclusion on

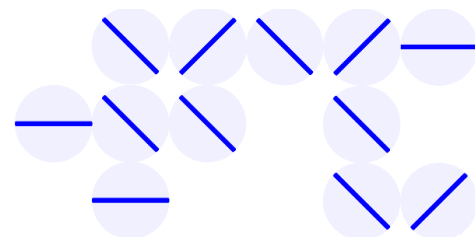
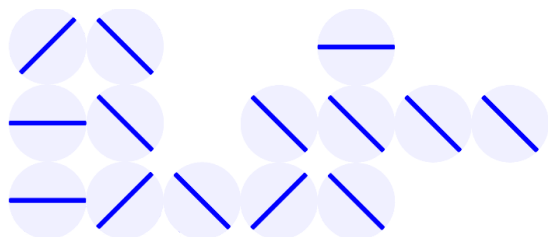


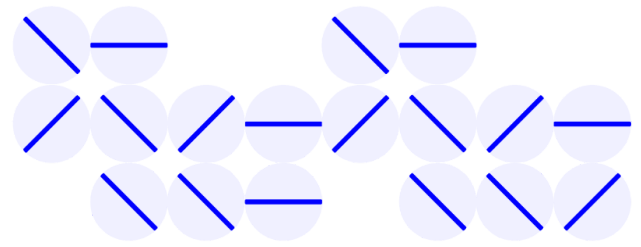


support for mobile browser extensions on iOS and Android. Sub-section 4 begins with the accurate summary of the competitive issue at hand: the CMA underlines that the limited support for browser extensions on iOS and Android is not only harmful to “users, who are less able to customise their browsing experience by using extensions to add features or functionality relative to desktop”, but “also has implications for developers, who have less access to a potentially lower cost distribution channel for their applications or content” (paragraph 6.20). This description is an accurate observation and analysis of the evidence provided. We were confounded as the provisional decision report then continues by stating that they “have not seen evidence that this limited support for browser extensions has negative impacts on competition between mobile browsers on either iOS or Android” (paragraph 6.21). This statement seems to directly contradict the arguments and evidence presented and discussed before. In the next sentence, the CMA re-confirms that “limited support for browser extensions on iOS and Android is an outcome of the limited competition between browsers on iOS and between browsers on Android” (paragraph 6.20). The findings of sub-section 4 contradict themselves as well as disregard the CMA’s findings from subsection 3, especially related to the competitive disadvantages developers face (paragraphs 6.16-6.17) and the harm done on consumers (paragraphs 6.18-6.19). We urge the CMA to reassess its conclusions of sub-section 4 and re-consider the imminent need for remedial measures to finally bring developers and users the benefits of a fair and competitive market.

While we are puzzled by the statement that there is no evidence of a relationship between this competition and barriers to entry, we nonetheless commend the helpful identification of this lack of consumer-facing competition in extension-based services as a market failure (paragraph 6.22). We therefore urge the CMA to consider remedies to address it using the full suite of legal powers under the Enterprise Act and the Digital Markets, Competition and Consumers Act, including interoperability on an equivalent basis with Google’s other products (especially desktop Chrome). Especially considering the existing limitations to browser switching²¹, there is a logical gap in remedies unless there is a means to enhance consumer-facing opportunities to switch to competing products within the browser. This logically implies a need for in-product

²¹ [Mobile Browsers Qualitative Consumer Research \(Verian Group\)](#)





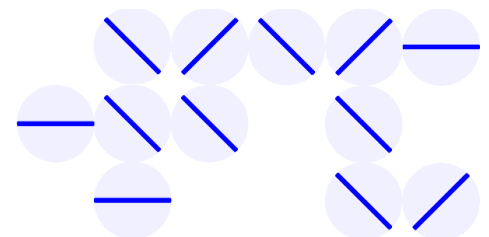
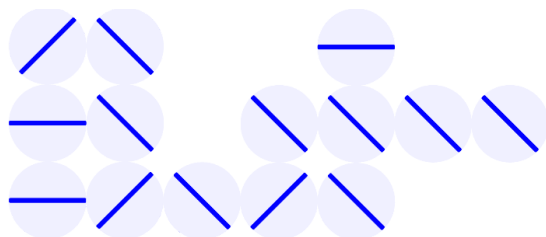
unbundling, so that consumers can enable extensions to allow different data handling practices, user experiences or advertising models.

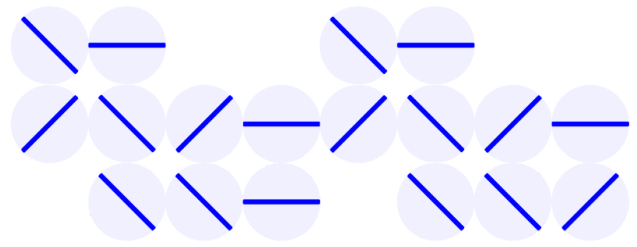
Equivalence of access: adverse effects on competition

Throughout its provisional decision report, the CMA emphasizes the importance of equitable access to functionality when designing remedies. The CMA identifies different practices and use cases in which APIs and other functions are not made available to others, resulting in adverse effects on competition. In such cases, the provisional decision report proposes remedies to address those. In this context, we urge the CMA to reconsider its conclusions on chapter 6 (“Browser extensions”, pages 262-271), since the limited support of mobile extensions on iOS and Android - especially the ban of mobile extensions on Chrome from Android - are depriving developers from an equivalent access to functionality. Given the dominant “duopoly in mobile operating systems” (paragraph 2.19), developers are not enabled to compete by offering mobile extensions. Instead, they are forced to either develop their own stand-alone mobile browser, which requires significant resources, costs and investments, or to miss out on the mobile market entirely. This disparity prevents developers from accessing functionality equally, as the provisional decision report states multiple times (paragraph 6.12, 6.16, 6.18, 6.19). The discrepancy in support for extensions on desktop and Android-based Chromebooks compared to Chrome for Android suggests self-preferencing. Given the provided evidence and the points made above, we strongly encourage the CMA to address the related issue and unlock the full potential of mobile browser extensions by designing and proposing the necessary remedies to ensure accessibility for all iOS and Android users. Indeed, it is only this in-product competition via extensions that will practically avoid the risk of a strong self-preferencing outcome whereby Google can shield competing products because of its strong position on Android. The ban of mobile extensions on Chrome from Android de facto is tying of the browser’s data collection rules and the browser itself, which significantly limits the contestable share for alternative approaches.

Consumer welfare

Considering the advanced stage of the market investigation and the forthcoming release of the final report, it is important to revisit the initial motivations for initiating



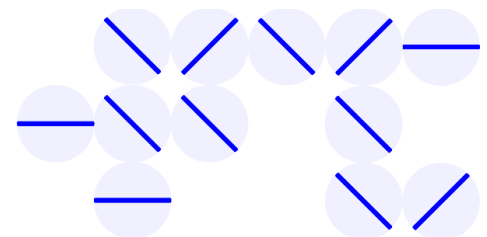
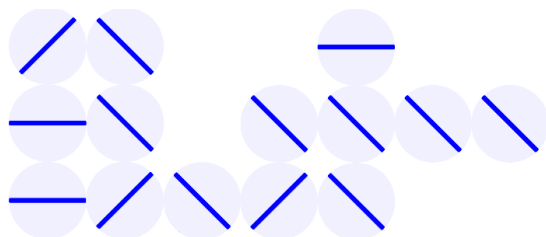


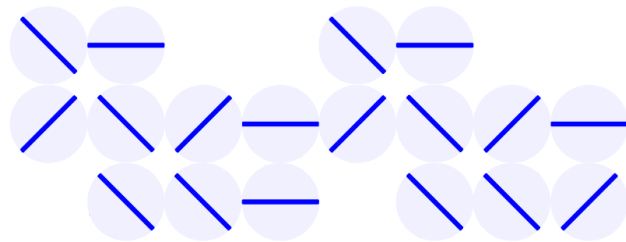
this investigation. In its reference decision from November 2022, the CMA identified a “significant detriment for consumers” (paragraph 3.2), voicing the concerns “that weak competition in [mobile ecosystems] is leading to worse outcomes for consumers and businesses alike” (paragraph 1.6)²². During the course of the investigation, evidence has shown that the limited support on mobile extensions results in the fact that consumers “miss out on additional functionality and choice” (paragraph 6.19). In the same context, it is worth noting that research suggests that the theoretical opportunity to switch mobile browsers (e.g., to a different browser which may support mobile extensions) does not address the consumer harm. The Verian Group research published by the CMA concludes that the “[a]wareness of alternative browsers is low, and respondents did not think there were differences between them (even among those who had experience of multiple browsers). As a result, there is minimal perceived benefit to switching or using multiple smartphone browsers”²³. Along the same lines, the provisional decision report rightfully identifies the “endowment” effect as a hurdle, since users stick to defaults and accustomed set-ups, as they are either unaware that different options exist or unable to actively change them, e.g., to switch mobile browsers (paragraphs 8.16, 8.25).

Indeed, we urge the CMA to further emphasise the implications of this important evidence: if there is limited switching, then remedies should not assume that it will take place. Therefore, if there is an adverse effect on competition in limited support for browser extensions, as correctly identified in paragraph 6.20, then remedies need to enable competition without requiring switching. Thus, interoperation of competing alternatives is the right approach, as it introduces consumer-facing competition. This is necessarily implied in the scenario of limited consumer switching, as identified by Verian; indeed, if this were *not* so then it is unclear why several of the other remedies would be required (since there would then be switching between competing alternatives). While the focus on barriers to entry is an important part of the picture, it is not the only focus because it is necessarily retrospective. It is possible for barriers to have been infinite (as for extensions on Android Chrome) and in such a case there will not be evidence of a link between competition and barriers *precisely because they exist in*

²² [Mobile browsers and cloud gaming - Decision to make a market investigation reference](#)

²³ [Mobile Browsers Qualitative Consumer Research \(Verian Group\)](#) (slide 10)





the first place. This is a version of the pernicious cellophane fallacy: because there are captive users, there has not been competition in relation to them, and therefore, no evidence of a direct short term relationship between barriers to entry and their welfare. We urge the CMA to be careful not to commit a serious false negative error on these facts, considering all evidence provided, especially the clear identification of a non-switching user group by the Verian research. For these users, there is every reason to open up in-browser competition through greater market access to competing providers via Android Chrome itself.

Time and again, the provisional decision report correctly identifies the proven consumer stickiness to defaults (paragraphs 8.24, 8.47). Considering this evidence, we advocate for proposing necessary remedies to support browser extensions in mobile ecosystems, to address the significant detriment for consumers, who cannot realistically be expected to switch to products against the available evidence.

Interplay of the market investigation and the Digital Markets, Competition and Consumers Act 2024

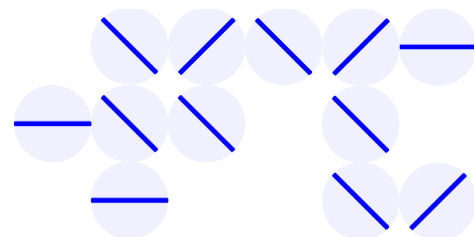
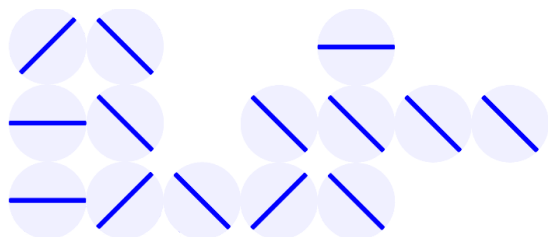
We acknowledge that the CMA's provisional decision on remedies results in recommendations to utilise the new digital markets powers under the Digital Markets, Competition and Consumers Act. We are eager to see the “new pro-competition regime for digital markets” in play, addressing adverse effects of competition to help businesses and consumers alike.

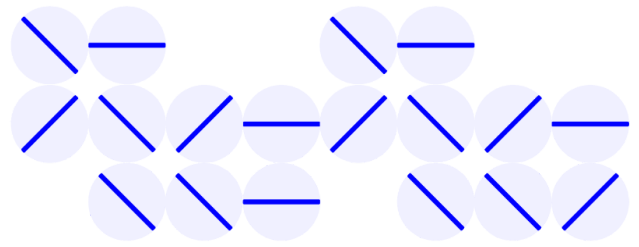
Moreover, we note that s.138 of the Enterprise Act contains an affirmative requirement:

“The CMA shall... in relation to each adverse effect on competition, take such action under section 159 and 161 as it considers reasonable and practicable...

- (a) to remedy, mitigate or prevent the adverse effect on competition concerned;
- (b) and to remedy, mitigate or prevent any detrimental effects on customers so far as they have resulted from, or may be expected to result from, the adverse effect on competition.”

We appreciate that these requirements are familiar to the CMA, but would respectfully note the requirements in s.138(2)(b) require a focus on impacts on the consumer. In





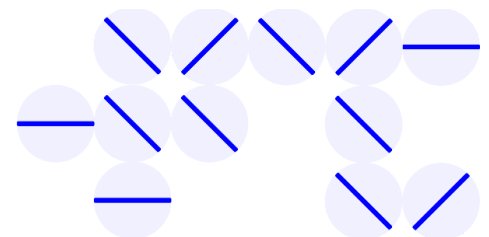
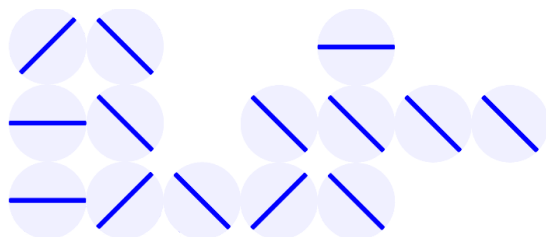
this case, paragraph 6.20 has identified a “detrimental effect on customers” in relation to the absence of browser extensions. There is also a requirement in s.138(2)(b) for a prospective analysis; therefore, the implications of the identified issue in paragraph 6.20 must be addressed with a view to making the market work better for customers in the future. This is the requirement of the Act and it cannot be disregarded just because the DMCCA has also been passed.

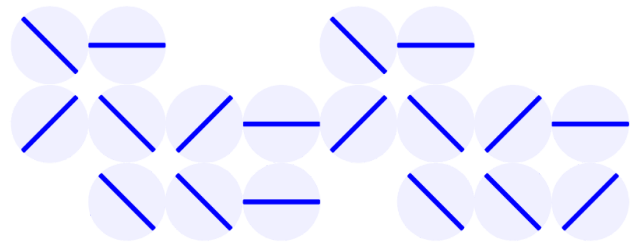
This interpretation is further bolstered by the requirement in s.138(4) for “the need to achieve as comprehensive a solution as is reasonable and practicable to the adverse effect on competition concerned and any detrimental effects on customers so far as resulting from the adverse effect on competition.”

We are concerned that the issues identified above with the interplay of barriers to entry analysis and consumer harm mean that the proposed solution of recommendations rather than immediate remedies falls short of the requirement to take all “reasonable and practicable” steps **within the investigation itself**.

Significantly, as the identified adverse effect on competition derives from the high share of Android (Chrome) (10.11(a), stating a 78% market share), the remedy must include competition within the 78% especially as there is not any significant evidence of switching away in the case of that very large 78% captive audience. As s.138 of the EA requires a remedy that reads on the adverse effect on competition, we respectfully submit that there needs to be a remedy that tackles scale, network effects, and limited consumer engagement head on.

Therefore, we urge the CMA and related stakeholders to address market concerns immediately. The evidence provided on the lack of mobile extensions are not only crucial, but also time-sensitive. Continued delays in market intervention will result in further consolidation of power within the browser duopoly or, at the very least, a cementation of the status quo, to the detriment of developers and consumers. Therefore, we urge the CMA to expedite its actions both in the context of this market investigation and under the Digital Markets, Competition and Consumers Act.





To the extent that recommendations under the new act are made, we request specificity to help ease and smooth the process. For example, the fruits of the impressive depth of investigation to date can give rise to specific proposals, e.g., particular pro-competitive intervention (PCI) proposals, or particular rulebook requirements to allow interoperability of competing alternative providers of extensions under the envisaged rulebook powers unless there are objective and compelling reasons for exclusion. Double standards as to API and extension support could also be specifically highlighted in recommendations to be sure that the DMCCA addresses them.

Concluding remarks

The CMA's provisional division report highlights the significant competitive and consumer harms resulting from the limited support for browser extensions on iOS and Android. While the CMA rightfully points out the negative impacts on consumers and on developers, the report stops short of linking these harms directly to adverse effects on competition and does not propose remedies. This conclusion appears contradictory, given the evidence provided by the CMA, including testimonies from developers, organizations advocating for mobile browser extensions, and consumer research.

As the evidence referred to above, the lack of mobile extension support forces developers to invest heavily in standalone browsers or forgo the mobile market entirely, creating significant barriers to entry and innovation. At the same time, users miss out on functionalities, features and choice. To address these concerns, we would welcome if the CMA reassesses its conclusions and propose remedies, to ensure fair competition and unlock the potential of mobile browser extensions for the benefit of consumers and developers alike.

