

# HomeOwners Alliance Response to the CMA Investigation into Google Search & Google Search Advertising Services

**HomeOwners Alliance - business profile:** This response is from HomeOwners Alliance ([hoa.org.uk](http://hoa.org.uk)). We have been in business for 12 years providing high quality, independent and well-researched advice content to UK home buyers, home sellers and home owners. The content we provide is free and we also offer a range of useful related services and tools to allow users to compare companies and find good value, rated service providers. We are well-regarded with a high degree of trust within the housing industry and amongst our website users. We are UK based and have 5 employees.

## Website statistics highlighting dominance of Google search:

In 2024, we had approximately 4 million users to the HomeOwners Alliance website:

- 80% (3.1 million) came from organic non-paid search results – **92% of organic traffic (2.8 million) originated from Google search**. The next highest search engine was Bing, providing 165K users (5%) from organic results.

## Key Concerns

At the HomeOwners Alliance, we are increasingly concerned about the impact of Google's dominance in search, paid search and more recently its introduction of AI overviews. These changes have made it significantly harder for us, and other publishers, to gain visibility in search results and provide users with the trusted information they need.

### 1. Impact on Publishers

Google's recently introduced AI overviews scrape content from publisher websites and present answers to users' search queries directly in consolidated Google overviews. While this may be convenient for users, it often means that their questions are answered without needing to click through to publisher websites. This approach devalues the time, expertise, and resources we and other publishers invest in creating high-quality content.

In terms of the direct impact on our business, since Google implemented its AI overviews on 15th August 2024, we have seen a **30% drop in website traffic** when comparing the month preceding the change to the month following it. This has had a direct knock-on effect on services tied to our website traffic and related revenue, which fell by a similar margin.

As publishers, we are faced with an impossible choice: allow Google to scrape our content without fair compensation or block access and lose all public visibility. This imbalance leaves us at a significant disadvantage and undermines the long-term sustainability of our business.

### 2. Lack of Transparency and Ethical Concerns

We are deeply frustrated by the lack of transparency in how Google selects, displays, and monetises our content within its AI overviews. Despite the significant investment we make in producing expert content, we are not given any insight or control over how our work is used.

Google does not consult us about how our content will be included in its overviews or provide any assurance that the original context and nuance are preserved. This leaves us in a vulnerable position where our hard work can be misrepresented or oversimplified without any recourse.

Moreover, Google's actions feel inherently unfair. We are shouldering the cost of content creation, yet Google reaps the benefits by keeping users on its platform, driving engagement, and profiting from ads. This imbalance cannot be ignored.

### 3. **Consumer Harm**

We are also concerned about the impact of these AI overviews on consumers. While Google aims to provide quick answers, we have observed instances where its summaries have presented **incorrect or misleading information** in key areas like property advice, planning permissions, and legal guidance.

Additionally, as more publishers struggle to survive due to declining revenue, the diversity and quality of information available to consumers will inevitably suffer. This will harm consumers by reducing access to expert and trustworthy advice on critical topics.

### 4. **Market Power and Monopolistic Behavior**

Google's control over both organic and paid search results creates a powerful incentive for the company to prioritise paid results over organic ones. This practice further limits the visibility of our content, forcing us to rely more on paid advertising, which is neither sustainable nor equitable.

We recognise that Google's practices are part of a broader strategy to fend off competition from platforms like ChatGPT, which similarly offer AI-driven summaries. However, unlike Google, some of these competitors have begun exploring licensing agreements and opt-out mechanisms for publishers, demonstrating that there are fairer ways to operate.

We urge the CMA to consider the following measures to address the issues caused by Google's AI overviews:

- **Revenue-Sharing Mechanisms:** Google should compensate publishers whose content is used in AI overviews. This would allow us to continue producing high-quality content without bearing the full financial burden.
- **Transparency Requirements:** Google currently gives ranking advice and insight to help content creators ensure their content is served up in google search results. Given it is unlikely we'll see an end to AI overviews, we would like to see similar guidance for how to ensure our content is selected and (importantly) referenced in AI overviews.
- **Content Accuracy Oversight:** There should be clear guidelines to ensure that AI-generated summaries are accurate, particularly for sensitive or complex topics where consumers rely on expert advice.
- **Fair Competition Safeguards:** The CMA should take steps to ensure that Google does not unfairly prioritise paid search results over organic ones.

**Conclusion**

At the HomeOwners Alliance, we are committed to providing reliable, expert advice to homeowners. However, Google's AI practices threaten our ability to do so. Without meaningful intervention, we risk losing not only our ability to reach our audience but also the diversity and quality of information available to the public, and ultimately the basis of our property advice business which currently serves 4 million users a year.