

PPA (Professional Publishers Association)

Response to invitation to comment: SMS investigation into Google's general search and search advertising services

About the PPA

The Professional Publishers Association (PPA) is the professional body for special interest member companies, ranging from large consumer magazine publishers to business-to-business data and information providers, as well as smaller independent publishers. Its 300+ members include 150 of the UK's largest publishing houses, including Bauer Media Group, Condé Nast, Future PLC, Haymarket Media Group, Hearst UK, Immediate Media Co, Incisive Media, New Scientist and William Reed Business Media, as well as many smaller independent publishers.

Specialist publishing is worth £4.4 billion¹ to the UK economy, employing around 55,000² people. Its reach covers 83 per cent of the population, with more than 40 million adults in the UK reading a magazine each month³.

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Scope of the investigation and description of Google's search services

The PPA broadly agrees with the CMA investigating Google's search and advertising services. Google's dominance in the search ecosystem has made it the primary access point for digital information services. It deploys its market power in a variety of ways, including through algorithmic changes, AI Overviews, and leveraging its access to business and user data, using its resources to develop products and services to remain dominant in the global online marketplace.

Relating to publishers, magazine media and specialist publishers rely on Google and Search and ad services for traffic. Google acts as an online intermediary in disseminating news (via both General and News searches). Additionally, Google's AI tools (such as Gemini) take content from publishers to produce tailored responses to user queries.

¹ IBIS World (2024) "Magazine Publishers in the UK- Market Research Report (2014-2029)". [Link](#).

² PPA (2021) "Sector Insight Report". [Link](#).

³ PAMCo H2 2024 Jun'22 - Jun'24 print data fused with Jun'24 Ipsos iris data. [Link](#)

Google receives material benefits from user engagement with news and data derived from news on its platform.

Due to Google's dominance, many publishers are reliant on the platform to support their business models. Many of our members report that the majority of their traffic comes from Google Search. Any algorithmic changes, alterations to user interfaces, or the development of new products and services, will see a tangible shift in the business's search engine optimization (SEO).

We believe that the definition of strategic market status must be comprehensive and inclusive of tools used within Google Search – particularly those which directly compete with and divert user engagement from publishing businesses. This is crucial to ensure interventions can withstand evolving technologies and ensure that publisher businesses are able to continue to operate in the ever-changing digital landscape.

Publisher impacts – Zero-click searches and AI Overviews

The increase in zero-click searches on Google has had a significant impact on site traffic for publishers. Currently, 60% of Google searches in the US and EU result in zero clicks, with 30% of clicks directed to Google-owned products such as YouTube and Google Maps, leaving the remainder to open web (including paid ads)⁴. These changes affect publishers' ability to generate revenue, maintain SEO rankings, and build credibility and trust.

While publishers and businesses have adapted to evolving digital trends, they are prevented by Google from obtaining insight into the changes Google implements—such as algorithmic adjustments and user interface updates—leaving them unable to effectively mitigate sudden disruptions to their visibility and traffic. The introduction of AI Overviews and Knowledge Panels at the top of Google search pages diverts user attention and diminishes or obviates the need for consumers to click-through to publisher's content via organic search results. As a result, publishers have become increasingly reliant on other Google products such as News and Discover to maintain visibility, due to Google's dominance over other browsers.

Google's control over clickless searches and AI Overviews demonstrates how it leverages its search dominance to diminish referral traffic to the open web. This shift has fundamentally altered the relationship between the search engine and publishers, forcing publishers to depend on Google's own ecosystem for exposure rather than benefiting from direct search traffic, and threatening the viability of the publishing business model altogether.

⁴ SparkToro (2024) "2024 Zero-Click Search Study: For every 1,000 EU Google Searches, only 374 clicks go to the Open Web. In the US, it's 360." [Link](#).

Additionally, AI models are increasingly becoming a preferred source for online search, with 65% of consumers indicating plans to replace traditional search engines with tools like ChatGPT⁵. While Google faces competition from AI models for consumers, its dominance is reinforced by the amount of data stored in its index. This enables Google to develop powerful AI tools using publisher data it already controls, giving it a significant competitive advantage in the AI search market. On top of this, Google uses its position of market power by effectively forcing publishers to allow their content to appear in AI Overviews as publishers would otherwise compromise their appearance in organic search results. This raises key concerns about Google's ability to entrench its mark

et power further, limiting competition and restricting publisher autonomy in the evolving AI-driven search landscape.

We recommend that the CMA considers the below interventions to address the issues raised:

1. **Adopt models for fair compensation:** In line with recommendations from 2022, the CMA, in collaboration with other regulators such as Ofcom, should work to implement frameworks that ensure publishers are fairly compensated when their content is used. This is particularly important in cases where features like Knowledge Panels and AI Overviews diminish referral traffic to publishers' sites. Additionally, the CMA and Ofcom should consider including conduct requirements that ensure publishers receive fair access to data about user interactions with their content when hosted on platforms, as part of their negotiation processes.
2. **Opt-out mechanisms:** Publishers must have the ability to opt out of having their content included in AI overviews (or trained on) without any impact on visibility in Google's search results. This would allow them to maintain control over their data while participating in the digital ecosystem on fair terms.
3. **Transparency requirements:** Google should be required to disclose how publisher content is sourced and used to train and power its AI models, including clear information on the data usage and revenue generated from these features.
4. **Require Google to inform publishers of algorithm changes and introduce a dispute resolution mechanism:** The CMA should mandate that Google provides timely and transparent notifications about significant algorithm changes affecting search rankings, visibility, and traffic. Additionally, a formal dispute resolution mechanism should be introduced, allowing publishers to challenge unilateral changes that negatively impact their business. This would ensure

⁵ Forbes Advisor (2023) "Over 75% Of Consumers Are Concerned About Misinformation From Artificial Intelligence". [Link](#)

greater transparency, prevent unfair disadvantages, and introduce independent oversight to mitigate the effects of ranking adjustments.

5. **Data sharing requirements:** As an aggregator, Google holds a vast amount of audience and behavioural data, reinforcing its dominance in online marketplaces. Google should be mandated to provide publishers with user data on interactions with their content to help address the lack of competition in the digital advertising landscape. This will also help to create a fairer playing field for publishers to make informed business decisions.
6. **Allow AI Overview tracking in Search Console:** Currently, there is no access to any data on AI Overviews in Search – where they are appearing, who is appearing in them, and how this drives traffic and clicks (or affects the traffic and clicks to pages in the organic SERP). Rolling out a new feature without access to any data prevents publishers and business owners from making informed decisions.
7. **Appoint account managers for major publishers:** Currently, publishers have no direct line of communication with Google, despite Google using their content to train their AI models and benefitting from the creation of engaging, informative content for Google’s users. In order to help protect publishers (and Google’s own future as a Search operator), Google should be open to liaising with publishers, helping to resolve issues, review manual actions and penalties in a timely manner, and help provide data that ensures a productive working relationship and safeguards both businesses' futures.

We would caution against any measures that result in Google having to share its search index with third parties in a manner that may compound the historical and ongoing harms to publishers, whose content is included in or has been exploited to create, such indexes or other data repositories, without fair compensation.

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