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To: Competition and Markets Authority (CMA) **12/02/2025**
Subject: Invitation to comment: SMS investigations into Apple and Google's mobile ecosystems

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 Plus[1] and AdBlock[2], an Android mobile browser[3], 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) invitation to comment on the Strategic Market Status (SMS) investigations into Apple and Google's mobile ecosystems[4]. Given our active and unique role in the online advertising ecosystem, we are deeply invested in the mobile browser market and recognise the importance of the SMS investigation. After providing several comments to the CMA's market investigation in respect of the supply of mobile browsers and browser engines[5][6][7][8], we are eager to bring in our expertise and experience as well as part of the SMS investigations into Apple and Google's mobile ecosystems.

In the following, we provide comments to the questions 1, 2, 4 raised in the invitation to comment.

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[1] Adblock Plus
[2] AdBlock
[3] Adblock Browser
[4] Strategic Market Status Investigations into Apple's and Google's mobile ecosystems | Invitation to Comment
[5] eyeo response to the issues statement
[6] eyeo response to working paper 3
[7] open letter mobile browser extensions
[8] eyeo response to PDR

Q1: Do you have any views on the scope of our investigations and descriptions of Apple's and Google's mobile ecosystem digital activities?

We appreciate and welcome the CMA's detailed examination of the competitive dynamics within Apple's and Google's mobile ecosystems.

As a provider of Adblock Browser, a mobile browser for Android based on Blink, we directly experience the issues of indirect network effects and restrictions on browser functionalities. Smaller browser vendors, like us, find it challenging to differentiate their offerings and features, given that browser engines dictate the capabilities of websites and web apps. Thereby, we can confirm the outlined market dynamics under paragraph 65(b) and 66[9].

Generally, we support the scope of the investigation, however, we are convinced that additional issues should be taken into account. Please refer to the next question for more details.

Q2: Do you have any submissions or evidence related to the avenues of investigation set out in paragraph 70-72? Are there other issues we should take into account, and if so why?

We want to highlight that the **lack of support for browser extensions on iOS and Android** significantly restricts competition and urge the CMA to **assess the limited support for mobile extension on Safari on iOS** and the **ban of mobile extensions on Chrome from Android** under this SMS investigation. These limitations hinder fair competition, impede innovation by forcing developers to build standalone browsers or to miss out on a relevant distribution channel entirely. At the same time, the choices for users are significantly reduced.

In the following, we outline our arguments to include the lack of support for browser extensions on iOS and Android in this SMS investigation. First, we want to outline and illustrate the CMA's analysis of the subject at hand, which discussed this issue before as part of the market investigation in respect of the supply of mobile browsers and browser engines. Second, we want to provide an overview of the related stakeholders' perspectives.

[9] Strategic Market Status Investigations into Apple's and Google's mobile ecosystems | Invitation to Comment

Lack of support for browser extensions on iOS and Android: Previous assessments of the CMA

Under the market investigation in respect of the supply of mobile browsers and browser engines[10], the CMA acknowledges substantial concerns regarding structural barriers to competition and innovation resulting from the lack of mobile browser extension support. The CMA's working paper 3 explains that "[b]rowser extensions are additional software applications that can add functionality or features to a browser and enable users to customise their browsing experience. Popular extensions add functionality including ad blocking, productivity tools, grammar and spell-checking, amongst others. Browser extensions are generally developed by third parties (ie not the browser vendor themselves)"[11] (paragraphs 5.1-5.2). The CMA accurately states that even though "[o]n desktop, browser extensions are widely available, including on Chrome and on Safari", (paragraph 5.3), the "support for browser extensions on iOS and Android is limited compared to the level of support seen for desktop browsers" (paragraph 5.4).

More concretely, the CMA notes that "[a]lthough Safari does support extensions on iOS, evidence suggests this is more limited than on desktop. This limits users from accessing the same extension functionality on iOS that may be available to them on desktop, and prevents them from switching to an alternative browser that might offer greater choice of extensions" (paragraph 5.7). On Android, "third-party browsers are able to support browser extensions" (paragraph 5.8), but "Chrome, which represents 77% of browser usage, does not support extensions. This is in contrast to the position on desktop where Chrome does offer full support for extensions. This limits users from accessing the same extension functionality on Chrome on Android that may be available to them on desktop" (paragraph 5.10).

Finally, the CMA concludes that the limited support for browser extensions on iOS and Android identified "has implications for browser users, who are less able to customise their browsing experience by using extensions to add features or functionality, relative to desktop [and] for developers, who have less access to a potentially lower cost distribution channel for their applications or content, and less access to a potential entry point into browsers" (paragraph 5.11). Furthermore, the CMA summarizes that the "limited support for browser extensions on iOS and Android may be an outcome of the limited competition between browsers on iOS and between browsers on Android. This may mean that Apple and Google have less incentive to offer full support for this feature relative to desktop where there is more competition amongst browsers" (paragraph 5.11).

[10] CMA market investigation in respect of the supply of mobile browsers and browser engines
[11] CMA WP3: Access to browser functionalities within the iOS and Android mobile ecosystems

On the same issue, the CMA's Provisional Decision Report[12] dedicates an entire chapter to impact on competition resulting from the limited support for browser extensions on iOS and Android mobile devices. Concretely, the CMA acknowledges that

- mobile extensions are not available as a distribution channel for developers. This forces them to develop new browsers or apps, or else miss out on the mobile market entirely (paragraphs 6.16-6.17),
- the inability to use mobile browser extensions has a negative impact on consumers by limiting their access to additional features and choices, harming consumers by preventing them from taking advantage of additional features, services, and functionality (paragraph 6.18).

According to the CMA, "[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).

Furthermore, the CMA confirms in the Provisional Decision Report 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). In addition, the CMA concludes that "Apple and Google face limited competitive constraints on their mobile browsers, and therefore have less incentive to compete vigorously for users by offering features such as browser extensions" (paragraph 6.22).

Given the significant evidence outlined in the CMA's assessments on the competitive and consumer harms resulting from the limited support for browser extensions on iOS and Android, as well as the related submissions from related stakeholders, we urge the CMA to include the lack of support for browser extensions on iOS and Android in this SMS investigation.

Lack of support for browser extensions on iOS and Android: Stakeholder perspectives

In the CMA's Provisional Decision Report, evidence and submissions from Apple and related third parties indicate that Safari, generally, supports extensions on iOS. However, the support seems limited and inferior relative to that on desktop (paragraph 6.3)[13]. Evidence and submissions from Google on the same issue were to a large extent redacted (paragraph 6.6(a)). In the only non-redacted sentence on this issue, Google stated to the CMA that "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)). However, recent reports indicate that Google plans to support

[12] CMA Provisional Decision Report: Mobile Browsers and Cloud Gaming
[13] CMA Provisional Decision Report: Mobile Browsers and Cloud Gaming

extensions on Chrome for Android for some selected mobile devices, such as Chromebooks[14][15][16]. This development seems to stand in contrast to the claims made to the CMA that Google does not view browser extensions as not an important feature (paragraph 6.6(a)). In addition, the plans indicate the technical feasibility of bringing extensions also to Chrome mobile users.

It is also worth highlighting that Google, despite banning mobile extensions on Chrome from Android, largely promotes and celebrates the success of extensions on desktop. As we pointed out before[17], for Chrome on desktop, the browser extension ecosystem created a competitive, user-focussed market offering a wide range of products for users to improve their overall online experience. Almost half of Chrome desktop users have extensions installed, choosing from over 180.000 extensions[18]. Google self-describes the desktop extension ecosystem as follows: "[U]nique and creative Chrome extensions to help with everything from productivity to accessibility on the web"[19].

Considering the above, we urge the CMA to challenge Google's position of banning mobile extensions on Chrome from Android under this SMS investigation, especially considering the claimed value these extensions bring to desktop users and to users on some selected mobile devices.

Finally, we believe it is worth mentioning the positions of affected stakeholders in the mobile ecosystem, besides the two duopolists[20]. Together with a diverse group of organisations that support greater choice and innovation for the web, including browser extension providers, smaller browser vendors, app and web developers, we reached out to the CMA with a call for competitive and fair market conditions for mobile browser extensions. In the joint open letter, this group of companies explains how consumers are missing out on innovative new features and services that can enhance their browsing experience, while at the same time, businesses are being harmed in a number of ways: Potential entrants into the mobile browser market are missing out on a low-cost route of entry. Also, browser extension providers are banned from shipping their products to certain browsers where many consumers spend the majority of time online. For our company alone, this negatively affects approximately 6

[14] Android headlines: Chrome browser app for Android may get extensions support
[15] Android police: Google Chrome for Android could finally support your favorite extensions from desktop
[16] Chrome Unboxed: Chrome for Android may get extension support, but it's likely not what you think
[17] eyeo response to the issues statement (p. 5)
[18] Chromium blog
[19] Google blog
[20] Strategic Market Status Investigations into Apple's and Google's mobile ecosystems | Invitation to Comment (p.11).

million users in the United Kingdom that cannot enjoy the same value of our products on mobile devices.

Given the evidence presented above, the absence of mobile extension support either forces developers to substantially invest into standalone browsers or apps, if they wish to remain competitive within the mobile market, or to miss out on the entire mobile market. This creates significant barriers to both entry and innovation. Simultaneously, users are deprived of functionalities, features, and choice. To address these concerns, we would appreciate it if the CMA would re-evaluate the conclusions referred to above and include the lack of support for browser extensions on iOS and Android in this SMS investigation.

Q3: Which potential interventions should the CMA focus on in mobile ecosystems? Please identify any concerns relating to Apple's or Google's mobile ecosystems, together with evidence of the scale and/or likelihood of the harms to your business; or to consumers.

Given our perspective as an actor in the mobile ecosystem, we generally endorse the potential interventions in mobile browsers and browser engines underlined in the invitation to comment (paragraph 87)[21]. We believe that adverse effects on competition can be tackled by removing barriers to entry and to compete (e.g., paragraph 87(1)i) and by giving users choice (e.g., paragraph 87(1)v).

Following our points raised above, we believe that an **additional potential intervention** should be discussed, namely **a requirement for Apple and Google to support browser extensions on Safari on iOS and Chrome on Android**. The mentioned evidence above underlines that the lack of such support significantly reinforces "Apple's and Google's strong position in relation to mobile browsers and limited competition from third parties" (paragraph 87). A related intervention in this context would "lead to greater competition for developing browser features related to performance, privacy and/or security which support user needs" (paragraph 88), since developers could offer the same wide range of extension products - many of which are improving performance, safeguarding user privacy and security, or boosting productivity. This would also "lower development costs and lower barriers to entry and expansion" (paragraph 88) for developers, who could benefit from an extension ecosystem on mobile devices as they do right now for desktop.

[21] Strategic Market Status Investigations into Apple's and Google's mobile ecosystems | Invitation to Comment