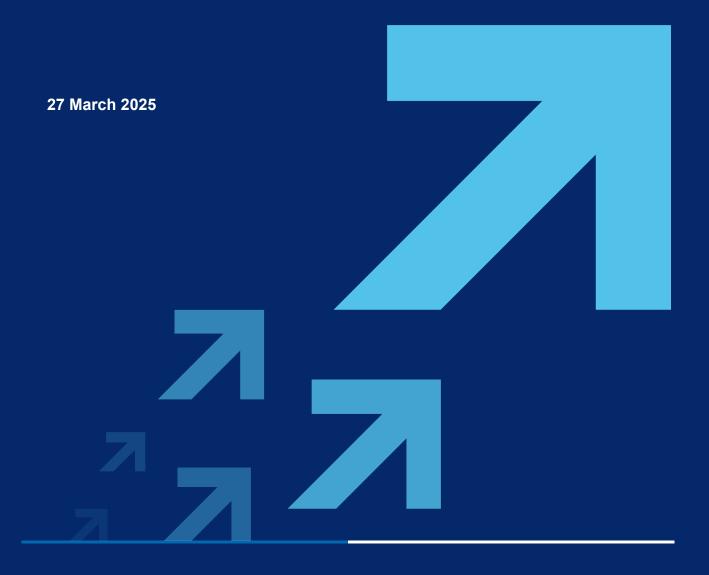


# Competition and Markets Authority Annual Plan 2025 to 2026

Promoting Competition and Protecting Consumers to Drive Growth, Opportunity, and Prosperity for the UK



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Promoting Competition and Protecting Consumers to Drive Growth, Opportunity, and Prosperity for the UK

Presented to Parliament, the Scottish Parliament, Senedd Cymru, and the Northern Ireland Assembly pursuant to paragraph 13(2) of Schedule 4 to the Enterprise and Regulatory Reform Act 2013 (as amended by section 40(3) of the United Kingdom Internal Market Act 2020)



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# 1. Forewords

#### Interim Chair's Foreword



It has been an honour to take on the role of Interim Chair of the CMA. I have several early reflections, and a lot of optimism about the year ahead.

First, I believe the growth mission as set out by government is vital for the UK – so that we can invest in the public services, infrastructure and innovation that will bring prosperity to everyone. I have seen the CMA really challenging ourselves as an organisation on how we can contribute to this goal. And that matters, because the foundations of what the CMA does – strong competition and consumer protection – can make a big difference to achieving it. In fact, the CMA's remit puts us in a unique position to look broadly across the economy and use our powers to open up opportunities and address obstacles constraining productivity, innovation or investment.

Second, my experience over more than two decades in consumer facing organisations has always been that to perform well, you need to understand and be really responsive to feedback. Acting as a bridge between the CMA and our stakeholders (whether that be businesses, investors, or consumer champions), I hope to reinforce the already positive work Sarah has been leading to make sure the CMA engages with an open door and an open mind. I have been clear that businesses need to approach that engagement sensibly, in good faith; and we will keep asking 'what works for you, what's going to give you the confidence to invest in the UK?'

Because I think we have a real chance now to build that confidence amongst companies and investors – both domestic and international – that the UK is a great place to do business. In doing that, our 'north star' should always be a regulatory environment that encourages the greatest possible level of business investment, subject to respecting the absolute importance of healthy competition and strong consumer protection.

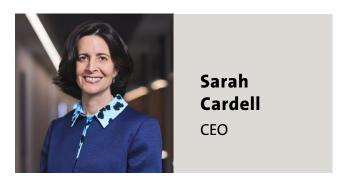
Reflecting on these last few months, as well as stakeholder feedback to this Annual Plan and more broadly, I think we are well positioned to seize this chance. I have found the CMA to be a deeply professional organisation – thorough and rigorous, operating with clear principles and values but also very open to feedback about where and how we can improve. There's a wealth of talent here, as well as highly capable leadership and a committed and supportive Board.

There is certainly work to be done, at pace, to make sure the experience feels genuinely different for our stakeholders across several core areas we have heard really matter. Sarah

and I are closely aligned about the meaningful changes needed for the CMA to become more efficient, to deepen our expertise, and to continue strengthening our engagement. I am confident the leadership and momentum is there to drive forward this well-considered programme of changes; and our direction of travel is closely aligned with the clear Steer we now have from government.

This Annual Plan is the third in a three-year strategy cycle that began in 2023. Later this year, we will begin a new cycle, with more detail to come on that in advance of our 2026/27 Annual Plan. In the meantime, the CMA will press on with the valuable work and engagement we do day-in-day-out, helping to drive the investment the UK needs to grow, whilst building and maintaining the confidence of those we serve.

#### **Chief Executive's Foreword**



A robust, independent competition regime promotes dynamic markets, supporting productivity, innovation and investment, and protects consumer interests – delivering more choice, better quality, lower prices. These are the fundamentals of the CMA's role and they remain as relevant and important for the UK today as they have ever been, as reinforced by the broad stakeholder feedback we received to our consultation on this Annual Plan.

Whilst these fundamentals have not changed, the external landscape in which the CMA operates has altered considerably in the last year. We have a new government, whose number one mission is economic growth, underpinned by higher levels of investment. Business confidence, and the UK's attractiveness as a destination for global capital, must play a pivotal role in the success of that mission – particularly in a turbulent geopolitical environment. We also have new legislation enacted by Parliament, with the potential to unleash enormous opportunities in digital markets and a step-change in more direct, impactful consumer protection.

Reflecting these changes, the CMA will have a new Strategic Steer from government, providing clarity on what we prioritise and how we go about our work. The draft Steer reinforces the importance of a strong, independent competition and consumer protection regime, whilst situating this squarely in the context of the growth mission.

So, whilst the CMA's purpose remains constant, the work we do and, crucially, the way we go about it, must reflect this changed environment. It must also inspire the confidence of those we serve. That includes businesses and investors, who must have confidence that they will be competing on a level playing-field, in a regulatory environment conducive to growth. And it includes consumers engaging in markets across the economy, who must have confidence that the CMA is actively standing up for their interests.

#### What does this all mean for the year ahead?

Starting with the fundamentals, we know that competition acts as an engine for productivity, innovation and growth. Reflecting the draft Steer, we will use our powers to make that engine work harder for the UK – maximising opportunities for companies of all shapes and sizes, and their investors, to scale and succeed here. We will focus expertise and resources on strategically important sectors within the UK government's Industrial Strategy; and on cross-economy enablers (like technology adoption and procurement) which have a multiplier effect on growth. In doing so, we will consider both where competition policy can help, and where it can flex – for example to enable collaboration which drives innovation.

We also know that effective consumer protection gives people the trust and confidence to be active participants in markets, driving spending across the economy. At the same time, businesses can feel confident that their competitors are playing by the same rules and cannot gain an advantage by breaking the law. Again, reflecting the draft Steer, we will address the unfair behaviour of a minority of businesses which weakens consumer confidence and stymies growth. Focusing sharply on clearly illegal conduct that results in tangible harms, we will help to put money back in people's pockets and protect the level-playing field for fair-dealing businesses.

Whilst staying true to these fundamentals, we must also challenge ourselves to ensure the competition regime supports UK global competitiveness and investment. That does not mean becoming less impactful in the outcomes we deliver for UK consumers. But it does require some fundamental changes to *how* the CMA works, and how we engage with business and investors. Taking into account both the draft Steer and extensive feedback over the last 6 months, we are taking forward a programme of meaningful changes based around four key principles, our 4Ps of *pace, predictability, proportionality and process* (by which we mean direct engagement with business).

In November, I committed to implementing these 4Ps across the CMA's functions, starting with merger control (where we received the most critical feedback) but progressing at pace to other areas of the CMA's work. In February, we announced a package of rapid, material reforms to the mergers regime to ensure we reach the right decisions as fast as possible, while minimising burden on businesses. We have since launched the review of our approach to merger remedies; and we have published a Mergers Charter, laying out what businesses should expect from our merger review process.

We are moving at pace to apply the 4Ps and the new Strategic Steer to other areas of our work. Our next priority has been the CMA's new digital and consumer functions under the Digital Markets, Competition and Consumers Act. We have made considerable progress across both areas, particularly in giving businesses certainty around the proportionality and predictability of our approach from the outset. We will provide more detail on this for both areas of work in April.

With these key ingredients in place, I am confident that the competition and consumer protection regimes can play a central role in supporting economic growth and long-term prosperity for the UK. This Annual Plan reflects our commitment to these critical national priorities and lays out an ambitious programme of work to support them this year, and in the future.

# 2. About the CMA

The CMA is an independent non-ministerial UK government department and is the UK's principal competition and consumer protection authority. We help people, businesses, and the UK economy by promoting competitive markets and tackling unfair behaviour.

We derive our powers from the Enterprise and Regulatory Reform Act 2013.<sup>1</sup>

The CMA is overseen by a Board, to which a number of new appointments have recently been made, including a new interim Chair, in January 2025. We are led by the Chief Executive and, as of last year, an almost entirely new senior executive team with a strong mix of competition, consumer and corporate expertise.

Decisions in some investigations, including phase 2 merger investigations, are made by members of the CMA's independent Panel.

The CMA has a UK-wide remit, with offices in Belfast, Cardiff, Edinburgh, London, and Manchester, in addition to the Microeconomics Unit (MU) based in Darlington. We adopt an evidence-based, integrated approach to our work, selecting the tools we believe will achieve maximum positive impact for people and businesses (wherever they live and operate in the four nations), as well as for the UK economy.

#### **Functions**

The CMA's statutory duty under the Enterprise and Regulatory Reform Act is to promote competition, both within and outside the UK, for the benefit of consumers.

Our main functions are:

- Investigating mergers that have the potential to lead to a substantial lessening of competition. If a merger is likely to reduce competition substantially, the CMA can accept remedies to address concerns; or in the absence of effective remedies, prohibit the transaction. The CMA performs this function in a targeted and proportionate way, enabling the vast majority of deals to go ahead, whilst looking more closely at the small number of cases which are truly problematic for UK consumers and businesses from a competition perspective.
- Investigating businesses to determine whether they have breached UK competition law, ending and deterring breaches by fining businesses and, where appropriate, seeking the disqualification of the company directors involved. Illegal anti-competitive conduct subverts the proper functioning of fair, open, and effective competition. Tackling it can bring down barriers to entry and scaling for fair-dealing businesses, as well as boosting productivity and incentives for investment.
- Enforcing consumer protection legislation, including through a new administrative enforcement model for consumer protection expected to commence in April under the Digital Markets, Competition and Consumer Act 2024 (DMCCA). Strong consumer enforcement by the CMA helps put money back in people's pockets and ensures they are treated fairly, so they can engage actively and confidently in markets. The CMA

<sup>&</sup>lt;sup>1</sup> The powers of the Office for the Internal Market are set out in the UK Internal Market Act 2020. The CMA has powers linked to the Subsidy Advice Unit which derive from the Subsidy Control Act 2022.

operates alongside several other bodies across the UK with consumer enforcement responsibilities, including trading standards and other members of the Consumer Protection Partnership (CPP).

- Conducting studies, investigations, or other pieces of work into why particular markets are not working well. The CMA can take action – and recommend action be taken by others – to help markets work better. Interventions can be designed to (for example) improve price and quality for consumers, tackle barriers to success for small and scaling businesses, support economic growth, and build trust in markets for the benefit of all participants.
- **Operating a new regime to promote competition in digital markets** under the DMCCA. The new regime is targeted, proportionate and uniquely designed to unlock opportunities for growth, innovation, and investment in the UK tech sector and more broadly across the economy.
- Giving information or advice on matters related to any CMA functions to governments and public bodies across the UK. This includes advice on how policy can be designed and implemented to promote the interests of consumers and harness the power of competition to deliver long-term growth and prosperity for the UK.
- **Providing information and advice to people and businesses** about their rights and obligations under competition and consumer law. This ensures consumers can make well-informed decisions and receive fair treatment, as well as encouraging and facilitating companies to stay the right side of the law.
- **Promoting stronger competition and consumer protection in the regulated industries** (gas, electricity, water, aviation, rail, communications, and financial services), working with the sector regulators to do so.
- **Conducting regulatory appeals and references** in relation to price controls, terms of licences or other regulatory arrangements under sector-specific legislation, being prepared to offer advice and support to government on any potential longer-term changes to the regulatory appeals system.
- Through the Office for the Internal Market (OIM), providing advice, reporting, and monitoring in relation to intra-UK trade.
- **Through the Subsidy Advice Unit (SAU),** providing advice, reporting, and monitoring in relation to government subsidies that support important policy objectives.
- **Through the MU,** providing deep expert analysis and research on issues relevant to growth, innovation, productivity, and supply-side reforms.

#### The impact of our work

Delivering positive outcomes for people, businesses and the UK economy is integral to the CMA's work. We recognise the importance of evaluating and reporting on both the impact of our work, and the way in which we carry it out.

We do this regularly, including through our annual Impact Assessment, Annual Report and Accounts and broader communications throughout the year; Mid-Year and End of Year reviews with the Department for Business and Trade (our sponsor department) (DBT); and appearances in front of Parliamentary Select Committees (including the Business and Trade Committee, to whom we are accountable as our sponsoring Committee). The CMA is currently engaging with DBT on a refreshed performance management framework agreement.

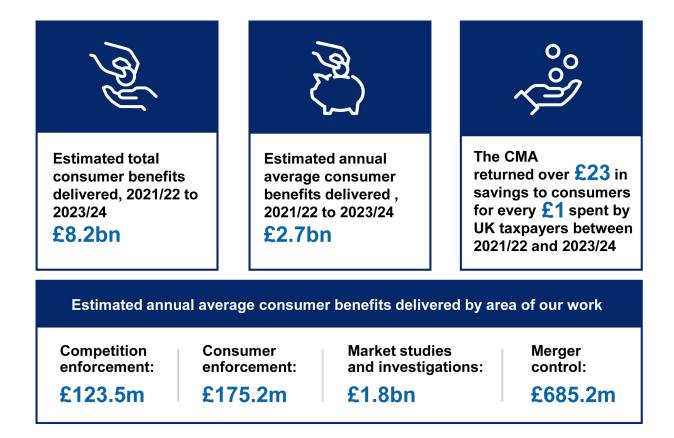
As signalled in our Annual Plan 2024/25, over the course of the last year we have been working on a programme to enhance the evaluation and reporting of the CMA's work. We will begin to report annually on the impact of the CMA's work on economic growth through our

future Annual Report and Accounts. We will also ensure that the CMA's future annual and corporate reporting reflects any requirements set out in the final version of the UK government's new Strategic Steer and revised framework agreement. We expect, for example, to report specifically in our future Annual Report and Accounts on how we have applied the Steer in practice.

#### Direct and indirect financial benefit

Each year, the CMA estimates the direct financial benefit of our work for consumers. This is based on conservative assumptions and is subject to independent review.

Our most recent Impact Assessment demonstrated that we returned an average of over £23 in savings to UK consumers for every £1 of taxpayer money spent in the three years to 2023/24. This is against the target of £10:1 set by the UK government. Over the first ten years of the CMA's operation, we delivered more than £20bn in direct consumer benefits.



This annual Impact Assessment excludes many important, wider indirect benefits from the CMA's activities – notably the deterrent effect of our work, which is likely to be substantial. For example, evidence indicates that between 5 and 28 cartels are deterred for every one that is caught, making a significant indirect contribution to the level playing-field that provides confidence to fair-dealing businesses and their investors.

In January, we published a new CMA literature review from the MU synthesising key insights from recent studies on the wider impacts of competition policy and enforcement. The body of evidence indicates that strong competition enforcement has significant wider economic benefits, including on innovation, productivity and consumer welfare.

# **3. Supporting Growth, Opportunity, and Prosperity for the UK**

The CMA harnesses the power of competition and consumer protection in the interests of UK consumers and businesses. This delivers not just lower prices, but more innovation, choice, quality, security of supply, productivity, investment, and economic dynamism.

Strong competition and consumer protection:

- Spur innovation, investment, productivity and dynamism across the whole economy;
- Create **opportunities for UK businesses** and **investors** to enter markets, scale and thrive, confident they will be competing on a level playing-field;
- Maximise the **long-term impact of growth and investment** and help ensure it is diffused across the whole economy;
- Build **confidence for people to engage with markets**, empowered to make informed choices without being misled or exploited;
- Shore up **economic resilience and self-reliance**, through greater diversity of supply and strengthened incentives for firms to build robust operations;

And through all of these, foster long-term prosperity for the benefit of everyone in the UK.

#### **Draft Strategic Steer for the CMA**

The UK government's draft Strategic Steer for the CMA was published on 13 February 2025. The draft Steer reflects the benefits that flow from effective competition and consumer protection, situating these squarely within the government's primary aim of driving economic growth.

The draft Steer states that government expects to see clearly and quickly how the CMA intends to account for the new Steer in our work; and for the CMA's Annual Report and Accounts to lay out how we have applied the Steer in practice. Our initial plans to reflect the draft Steer in our work are set out below, subject to any potential changes when the final version of the Steer is published.

The draft Steer provides an important framework to guide the CMA as we carry out our statutory functions to promote competition and protect consumers. It reinforces the importance of an effective, independent competition and consumer protection regime which supports growth by driving greater productivity, innovation and investment. It makes clear the role of the CMA in enhancing both business and consumer confidence to grow the economy; and it emphasises that *how* we go about our work is particularly important to investment and the attractiveness of the UK as a destination for investment.

More specifically, the draft Steer provides helpful guidance on the considerations the CMA should have in mind where we have discretion on which issues to tackle, and how best to intervene or design remedies. In particular:

• Where we have discretion, we have a clear steer on *what* to prioritise and *how* to design our interventions, with a strong focus on driving growth and investment in the UK. This

includes supporting growth and international competitiveness in the eight key sectors of the UK government's Industrial Strategy.

- Prioritising action where there is a clear and direct impact in the UK, and thinking carefully about when and how we engage in global issues.
- Within the UK, working with other relevant regulators to ensure regulatory action is coherent, timely and that it supports growth and investment in the UK.
- Using the new digital markets competition regime flexibly, proportionately and collaboratively to unlock opportunities for growth across the UK tech sector and the wider economy.
- Using our new, direct consumer protection powers under the DMCCA to help grow the economy through promoting consumer trust and confidence, while deterring poor corporate practices.
- Tackling anti-competitive conduct which harms businesses and consumers as swiftly as possible, in line with the new duty of expedition.
- Prioritising areas where competition can play an important role in driving efficiency and an enhanced user experience in the provision of key public services.
- Continuing to provide government with evidence and advice on key policy issues, including through the provision of research and policy advice on the development of the Industrial Strategy.
- And continuing to develop a contemporary evidence base to demonstrate our impact on the UK economy, including demonstrating how competition improves consumer outcomes, encourages innovation, drives investment, and ultimately delivers economic growth across the UK.

We explain below how the themes of the draft Steer are reflected in our proposed programme of work for the coming year. Notably, we outline an ambitious programme of change in the way we go about our work, reflecting not only the draft Steer but also feedback we have heard directly from businesses and investors. This consistent feedback has highlighted four key aspects of the way we work which must evolve: pace, predictability, proportionality and process (essentially our direct engagement with business). This is the CMA's '4Ps framework', with which key aspects of the draft Steer are directly aligned.

# Using our statutory functions to drive growth, opportunity, and prosperity for UK businesses and consumers

We are committed to using the powers entrusted to us by Parliament in a way that upholds our responsibility to promote competition and protect consumers, while supporting growth and investment.

**1 Through the CMA's market reviews, studies and investigations** we ensure markets across the UK economy are working well for businesses and consumers. That includes identifying and removing barriers to entry and growth; opening up opportunities for innovators, entrepreneurs, and investors; and ensuring fair outcomes for consumers. Our

markets work generates considerable direct benefits for UK consumers and businesses.<sup>2</sup> For example, our retail banking market investigation paved the way for the UK's Open Banking revolution, with startups and challenger firms powering a host of new fintech services. These are now used by over 70% of UK consumers and worth over £4bn to the UK economy annually.<sup>3</sup>

In the coming year, we will continue our ongoing programme of consumer-facing markets work that helps to put money back in people's pockets and deliver benefits across products and services they rely on every day. We recently set out comprehensive proposals to deliver better prices and greater choice for parents in the infant formula market and stand ready to support government taking these forward. Our veterinary services market investigation will conclude this year, supporting a thriving veterinary industry relied on by millions of households across the UK.

Alongside this, and consistent with the draft Strategic Steer, we will apply a sharper priority to markets work that could have a multiplier effect on growth. Recent work has included recommendations to government in housebuilding, which spurs investment and supports productivity through improved labour mobility and skills; and electric vehicle charging infrastructure, the backbone of sustainable transport. In particular, we will look for opportunities to unlock investment in critical infrastructure, and identify areas where key horizontal enablers (such as access to data or technology adoption) can drive growth.

Working closely with government, and leveraging the capabilities of our MU, we are evaluating how our markets work can support the successful implementation of the UK government's Industrial Strategy.

We are currently reviewing the way we conduct our markets work in line with the 4Ps framework and will update on this later in the Spring.

**2 Our competition enforcement** work has an important role to play in safeguarding markets that drive innovation and productivity. Only through competitive markets, in which companies are incentivised to play by the rules, can businesses and investors have confidence to invest and grow. This is particularly valuable in strategically important markets for the UK, like financial services where the CMA recently tackled information sharing between banks concerning government bonds (gilts).

Our competition enforcement work can also directly benefit consumers and taxpayers by driving down prices. Our work to address excessive pricing of vital drugs by pharmaceutical firms has saved the NHS hundreds of millions of pounds; while our enforcement against illegal cartels in the construction sector helps support key public services and infrastructure, including schools, hospitals, housing and roads.

The CMA has also supported lawful collaboration between businesses to drive innovation or other economic benefits in certain circumstances, for example through our Green Agreements Guidance. In other cases, the CMA has taken a public position not to prioritise

<sup>&</sup>lt;sup>2</sup> In financial terms, our market studies and investigations saved people in the UK £1.76 billion per year on average in the three financial years from 2021/22 to 2023/24.

<sup>&</sup>lt;sup>3</sup> See recent industry evidence.

enforcement action against particular agreements, such as those related to cutting-edge cancer therapies.

**This year**, we will continue to resolutely deter restrictive, exclusionary and exploitative anticompetitive practices. Consistent with the draft Strategic Steer, we will apply a particular focus on public procurement, as government pursues essential programmes to improve public services and invest in economic infrastructure.

In line with the draft Steer and applying the 4Ps framework, we will look for opportunities to accelerate the impact and outcomes from our competition enforcement work. Reflecting feedback from businesses, we will also provide further guidance on how they can collaborate to drive greater productivity and innovation, particularly in the UK government's priority Industrial Strategy sectors and in critical areas of need for the UK economy, such as skills.

#### PUBLIC PROCUREMENT

Public procurement represents around a third of UK public expenditure, equating to over £300bn per year. However, the value of public investments can be severely compromised by anti-competitive behaviour, such as bid rigging. Procurement is highly vulnerable to this illegal practice, which evidence suggests may inflate prices by 20% or more.<sup>4</sup>

The CMA takes direct enforcement action against these practices, as well as using enforcement communications and engagement to forewarn potential victims. We have reached approximately 80,000 public sector officials, resulting in a growing number of approaches to the CMA regarding suspicious activity. We also advise government and public authorities across the UK on the design of competitive procurement processes, as laid out in our 2021 policy paper which proposed that 'effective competition' be included as a legal principle of public procurement to drive value for money and reduce the risk of illegal activity.

With the Procurement Act now in force (from February 2025), suppliers found to have infringed competition law may be added to the new central debarment register and excluded from all public procurement for up to five years.

The CMA will now build on our strong track record in this area, particularly by leveraging our deep bid rigging identification expertise and extensive AI and data science capability. Combining these, we have begun to assist public sector organisations to identify anomalies in bidding data and indicators of potential illegal conduct. Using the right tools, and with access to the right data, we can increase the detection of unlawful conduct, potentially unlocking considerable productivity gains and public sector savings for the benefit of UK taxpayers.

<sup>4</sup> Government Counter Fraud Profession (2024), Bid-Rigging Risk in all Procurement: Practice Note.

**3 Merger control** can support innovation and productivity by keeping markets open and contestable, while safeguarding consumer interests in terms of lower prices, better quality goods and services, and more choice.<sup>5</sup> We have seen these benefits across any number of markets in recent years – from DNA-sequencing and software, to building supplies and rail transport. We have also seen how effective merger control can improve incentives for investment, following decisions in cases like Experian/Clearscore and Footasylum/JD Sports.

The vast majority of mergers raise no competition concerns – and many can enhance investment, innovation and greater business dynamism. This is reflected in the CMA's targeted and proportionate exercise of our merger control function, under which all but a small handful of mergers that we review go ahead – either unconditionally or with remedies to mitigate the harmful effects of a substantial lessening of competition on UK consumers and businesses.

Nonetheless, we know we have more to do to instil confidence in the UK merger regime and ensure we are contributing to a regulatory environment which promotes growth and investment, whilst continuing to uphold our responsibilities to UK consumers.

We have been working toward delivering a best-in-class experience for all parties involved in a merger review, including implementing a major overhaul of our phase 2 investigation process to deliver a more transparent, collaborative, less adversarial approach, with better opportunities for constructive engagement. We also recently raised de minimis thresholds from £15m to £30m, helping us concentrate on mergers that truly require our attention.

**Now we are going further**. Acting directly on feedback from businesses and investors, and consistent with the draft Strategic Steer, we have launched a package of rapid, meaningful changes to the merger regime based around the 4Ps.

#### IMPLEMENTING THE 4PS IN MERGER CONTROL

In February, we launched a package of proposals for a new approach to mergers – one which would compare favourably with international peers, enhance business and investor confidence, and enable us to continue protecting effective competition for the benefit of UK businesses and consumers. We have made substantial progress toward implementing these changes, with more to come later in the year.

#### Pace

The vast majority of deals the CMA looks at ultimately end in clearance (either unconditionally or with remedies), so we must move as quickly as possible to get to the right decisions. By June 2025, to minimise the end-to-end length of merger investigations, we will establish a new Key Performance Indicator (KPI) to complete the pre-notification phase within 40 working days (against a current average of 65). We will also reduce the current target for straightforward phase 1 cases from 35 working days to 25. These changes require

<sup>&</sup>lt;sup>5</sup> In financial terms, merger control saved people in the UK £685.2 million per year on average in the three financial years from 2021/22 to 2023/24.

a major streamlining of our approach. With the cooperation of merging parties and their advisors, we are confident they are achievable.

#### Predictability

The UK's 'voluntary' merger system offers advantages in terms of reducing burdens to notify for smaller firms, and a typically much lower number of investigations annually compared to economies of a similar size.<sup>6</sup> However, it can create uncertainty over whether the CMA will review a particular deal or not; and UK law gives us an unusually broad jurisdiction by international standards.

To strengthen business certainty, we will clarify and delineate our remit (as far as legally possible) by updating our guidance on how we interpret and apply both the relevant legal tests of 'material influence' and 'share of supply'. We will issue the updated guidance for consultation in June.

#### Proportionality

Every deal that is capable of being cleared either unconditionally, or with effective remedies, should be. Only a truly problematic merger, where the harm to businesses and consumers cannot be effectively addressed through remedies, should not proceed. We should also reach the best remedial outcomes as quickly and efficiently as possible.

We recently launched a review of our approach to remedies, looking at both process and how we strike the right balance between different types of remedies. This includes consideration of when behavioural remedies may be appropriate; how remedies can be used to preserve any pro-competitive effects of a merger and other customer benefits; and how the process of assessing remedies can be made as quick and efficient as possible. We are confident this will help us deliver on proportionality – so long as businesses and advisors engage in good faith, only putting forward robust remedies proposals and well-evidenced claims around benefits.

In line with the draft Strategic Steer, we will also take a proportionate approach to looking at global deals. We will always uphold our duty to protect UK consumers and businesses. Now we are carefully exploring how far (under existing law) we might more clearly distinguish between deals with a distinct and direct UK impact, versus those where it may be more appropriate to watch closely whether action by other authorities could resolve UK concerns.

#### Process

This relates to how the CMA engages with businesses. All businesses engaging in a merger process should feel listened to by the CMA; understand what we are doing and why; and recognise a sense of fairness and consistent treatment. We have published a Mergers Charter laying out what this – and our other principles of pace, predictability, proportionality – mean in practice. We also lay out our expectations of businesses and advisors to ensure the success of this new approach.

We will break down barriers to more direct engagement (both outside of and during investigations) including through a targeted outreach programme for businesses and

<sup>&</sup>lt;sup>6</sup> In the past three years, the CMA has conducted between 38 and 56 phase 1 investigations compared to several hundred investigations opened, respectively, in France and Germany (as well as investigations by the European Commission).

investors; more senior meetings early in the review process; and a suite of accessible, engaging, business-friendly materials.

It should be simple to keep track of accurate, up-to-date CMA investigation and intervention rates for mergers. We have refreshed the way we report this information so all stakeholders – businesses and investors in particular – can access clear annual and monthly statistics.

**4 The CMA enforces consumer protection** law to safeguard people from harmful and unfair treatment, supporting resilient household finances, and building the trust in markets that supports economic growth.<sup>7</sup>

We will continue to consciously prioritise areas of essential spend to help people struggling with pressure on household budgets. Last year, we made recommendations to government to improve unit pricing information so people can more easily shop around for good deals and genuine savings. We tackled issues around mis-selling and problematic contract terms related to leasehold homes; and we supported sustainable growth through our work on misleading green claims.

We have also raised consumer awareness and taken enforcement action around exploitative online choice architecture in retail markets, pressure selling, and fake reviews. In January, the CMA secured landmark commitments from Google to tackle fake reviews on platforms such as Google Maps. With as much as £23bn of annual UK consumer spending potentially influenced by online reviews, consumers must be able to trust the reviews they see, and businesses which do the right thing must not be put at a disadvantage.

In September 2024 we opened an investigation into Ticketmaster's compliance with consumer protection law in relation to the sale of tickets to the Oasis 'Live '25' reunion tour. This followed reports by fans of significant issues when seeking to buy tickets. The CMA has been engaging with Ticketmaster and gathering and analysing evidence from various sources. If the CMA believes that consumer protection law has been breached we may (under the existing law) seek undertakings from the company to address any concerns or, if necessary, we could take court action.<sup>8</sup>

**This year**, enhanced consumer enforcement powers under the DMCCA come into force. These will boost the CMA's ability to tackle misleading sales practices and unfair terms, and help to ensure that all fair-dealing businesses can compete on a level playing field.

In line with the draft Strategic Steer, we will use these powers to help grow the economy through promoting consumer trust and confidence, while deterring poor corporate practices.

<sup>&</sup>lt;sup>7</sup> In financial terms, consumer enforcement saved people in the UK £175.2 million per year on average in the three financial years from 2021/22 to 2023/24.

<sup>&</sup>lt;sup>8</sup> How the case proceeds will depend on the CMA's assessment of the evidence. It should not be assumed that any business under investigation has broken consumer law.

#### DMCCA CONSUMER PROTECTION POWERS

Consumers deserve to know that the CMA has their back; and fair-dealing businesses deserve to know that their competitors are playing by the same rules and cannot gain a competitive advantage by breaking the law. From April, for the first time, the CMA will be able to decide whether certain key consumer protection legislation has been breached without having to take businesses to court. Where the law has been broken, the CMA may impose fines up to 10% of annual worldwide turnover, as well as directly enforcing undertakings agreed with firms to resolve a problem affecting consumers.

The DMCCA also allows other enforcers of consumer protection law, such as Trading Standards Services and sector regulators, to apply to civil courts for the same monetary penalties issuable by the CMA.

At the beginning of April, alongside final guidance, we will publish an 'Approach' document for our new consumer protection powers. This will include detail on our enforcement priorities for the first 12 months of the new regime with a focus on the most egregious harms: for example, aggressive sales practices that prey on vulnerability, providing information to consumers that is objectively false, and contract terms that are very obviously imbalanced and unfair.

We are also mindful of the need for predictability, proportionality and strong engagement with businesses as the new regime is launched. We have heard consistent feedback that businesses – large and small – want to do the right thing for their customers and many are working hard to ensure they comply. But for smaller companies especially, the compliance burden must be proportionate. It must also be clear exactly what is needed to ensure compliance – especially in areas where the law has been updated or is less clear-cut.

Ultimately, when businesses get it right, consumers benefit. So we have said that in the early days of the regime, we will support the vast majority of well-intentioned businesses who want to do the right thing, giving them the clarity to comply as quickly as possible and the confidence that early enforcement action will be proportionate. Further detail will be provided in our Approach document in April.

**5** The CMA has taken forward a range of actions to promote competition in digital markets over recent years, helping ensure that the enormous benefits these can deliver are realised for UK consumers and businesses across the economy.

Effective competition fosters a level playing-field for all UK businesses to succeed (including millions of small businesses, scaleups and challengers), while also enabling the largest technology firms to continue to play a key role supporting innovation, investment, and talent development.

We have looked extensively at core markets like search, mobile ecosystems, digital advertising and cloud services, identifying opportunities for effective competition to enhance innovation, investment and growth. Commitments we secured in relation to online marketplaces have helped UK businesses access the customers and inputs they need to grow on fair terms, reducing scope for large firms to give themselves an unfair advantage over rivals.

We have also challenged ourselves on how the CMA can support a vibrant UK AI ecosystem – one with opportunities for diverse businesses of all shapes and sizes – to thrive. We know that heavy-handed, sweeping regulation can stymie innovation and growth. This is the opposite of what the UK needs and what the CMA seeks to achieve through our promotion of competition. We have published a set of principles for powerful AI foundation models, helping to guide these markets toward the potentially profound benefits they could generate for UK consumers and businesses.

**This year**, under the DMCCA, a new digital markets competition regime has come into force, offering a unique opportunity to harness the benefits of investment and innovation from the largest digital firms, whilst ensuring a fair shot at success for businesses across the UK tech sector. At the same time, the multitude of UK businesses and consumers who depend on the largest tech firms for critical products and services will benefit from more innovation, more choice and more competitive prices.

In line with the draft Strategic Steer, we will use the new digital markets competition regime flexibly, proportionately and collaboratively to unlock opportunities for growth across the UK digital economy and the wider economy. We will take particular care to ensure growth and innovation benefits are prioritised in areas of new and emerging technologies, including through supporting government in delivery of the AI Opportunities Action Plan.

#### DIGITAL MARKETS COMPETITION REGIME

In January, we launched our first strategic market status (SMS) designation investigations in relation to: (1) Google's position in search and search advertising services, and (2) Apple's and Google's position in their respective 'mobile ecosystems' which include the operating systems, app stores and browsers that operate on mobile devices.

How we operate this new regime will be critical to its success – and to ensuring it carries the confidence of businesses and investors, both in the UK and abroad.

The regime has been created with 'best-in-class' regulatory design features which already align well with the CMA's 4Ps. We have been actively considering how we might go even further in relation to applying the 4Ps, as well as how we will take account of the draft Strategic Steer. In April, we will publish a short document setting this out in more detail.

#### Pace

The DMCCA imposes tight statutory time limits and a broader statutory duty of expedition. In practice, we want to work as quickly as possible, whilst remaining mindful that pace must be balanced with engagement and effectiveness, especially at the outset of a new regime.

We will streamline our approach to investigations, focusing as quickly as possible on key areas of potential concern, rapidly standing down lines of enquiry where no clear evidence of concern arises, and prioritising issues where we can deliver positive outcomes for UK businesses and consumers quickly and effectively. We will avoid gold plating by requesting only salient information, and by keeping our decisions as short and clear as possible.

#### Predictability

One of the strengths and distinguishing features of the UK approach is the targeted, bespoke nature of the regime; but this can create some uncertainty about whether a firm will

be designated and, if it is, what rules will apply. Some clarity is provided by the legislation, published guidance, extensive stakeholder engagement and transparent timelines.

Now we are going further to provide predictability for businesses and investors, by incorporating an initial 'roadmap' for possible future interventions if the firm were to be designated with SMS. We will publish the roadmap when we consult on a proposed designation decision, providing clarity on issues likely to be prioritised for earlier action, deprioritised, or remain subject to further consideration.

Roadmaps for our current SMS investigations will be published alongside our consultations on the proposed decisions in June (for search), and July (for mobile).

#### Proportionality

This is the heart of the UK regime. Unlike some jurisdictions, there is no automatic process for designations, nor automatic regulatory requirements. Aligned with this, and reflecting the draft Strategic Steer and the CMA's prioritisation principles, we have said that we will prioritise interventions which have a clear and direct impact for UK consumers and businesses and strongly support business investment and economic growth in line with the draft Strategic Steer.

Reflecting the draft Steer, we will consider the interplay with other regulators domestically and internationally, prioritising where there is a clear case for UK-specific action. We will also carefully consider both risk levels and whether we have adequate resources available to deliver impactful outcomes at pace, including ensuring we have the right expertise and deep understanding of markets we are looking at.

#### Process

The regime is designed to be highly participative, based on deep engagement with diverse stakeholders. We are challenging ourselves to make sure this really works for businesses and investors, putting in place a regular, defined programme of engagement and a 'go to you' approach by the CMA which is quick, easy, and informal for businesses.

We will engage our Growth and Investment Council during SMS investigations; continue to strengthen ties with trade associations and UK-based venture capital firms; deepen direct engagement with the UK startups and scaleups that stand to gain from our work; and reach out to large UK-listed companies (including beyond the tech and digital sectors) to understand their perspectives.

**6 We provide independent and expert advice** to government and policymakers at UK, devolved and regional levels.

• **Through our statutory advocacy function**, we provide information and advice to help identify pro-competitive policy reforms, and to understand the impact that different policies will have on competition in particular markets.

The CMA undertakes much pro-active work in this space, working closely with government to ensure that our advice and recommendations can be acted on and balanced, as appropriate, with the broader range of policy objectives being pursued. We are regularly called upon (including by Parliamentary select committees, individual parliamentarians, government, and other public authorities) to look into issues of interest or concern.

 The CMA's MU provides a valuable source of expertise, analysis and primary research, working particularly closely with HM Treasury and DBT. The MU spearheaded the CMA's 2024 work on UK labour markets, launching new research around the benefits of wellfunctioning labour markets, which are widely recognised as an important driver of economic growth and productivity. It also led development of the CMA's third State of Competition report, which reinforces the importance to the UK economy of continued action to keep markets open, competitive, and dynamic.

**This year**, in line with the draft Strategic Steer, we will provide expert advice and fresh thinking to government on important policy areas – many with a strong focus on growth – including market dynamism, infrastructure, planning reform, transport, smart data and artificial intelligence. We will build on work begun in 2024 around how competition can be harnessed to support government Industrial Strategy.

We will also progress our MU Growth Programme which is focused on critical drivers and blockers of growth. We expect our advocacy work to complement our broader efforts to target our functions in support of growth and investment, including in sectors that are central to the UK government's Industrial Strategy.

#### MICRO-ECONOMIC AND ADVOCACY SUPPORT FOR THE INDUSTRIAL STRATEGY AND THE GROWTH MISSION

The CMA welcomed the UK government's vision for a modern industrial strategy as a central pillar of the national growth mission. Just as skills, trade, tax, or energy policy are key levers to support sectoral growth, so too is competition policy, helping to ensure that industrial strategy creates and captures maximum long-term value for the UK.

Consistent with the draft Strategic Steer, the CMA will support the Industrial Strategy by:

- Using our powers directly to promote growth in strategically important sectors, removing barriers to the flow of capital, innovation, and the scaling of businesses;
- Providing advice to government when it acts to drive growth in particular sectors, including around how pro-competitive principles can maximise the long-term impact of those interventions across the economy, whilst minimising the risk of unintended consequences.

Our advisory capabilities draw on substantial economic expertise, including within the MU. The MU's Growth Programme (announced in October 2024) is designed to support the UK government's growth mission and Industrial Strategy, and will continue to do so over the course of 2025/26.

The Programme is broadly focused on critical drivers and blockers of growth, including:

• Evidence on pro-growth industrial policy interventions, and lessons from past experience in the UK and overseas to help inform the UK's strategy, including their impact on productivity and competition. The CMA is due to publish findings shortly.

- An evidence review on the role of competition in driving and directing investment towards productive uses across the firm life cycle. The CMA is due to publish initial findings in the Summer.
- Analysis of productivity across and within sectors, links between this and the adoption and diffusion of technology and knowledge across the economy, and the role of competition in promoting technology adoption. The CMA is due to publish findings in the Summer.
- Understanding the strength of competition along supply chain networks across the UK economy, and how market power, costs and productivity propagate through them. The CMA is due to publish our findings in the Autumn.

The Programme is directly informed by the CMA's third State of Competition Report (published in October 2024), which is the most comprehensive assessment to date of how competition is working in the UK. The Report found that levels of effective competition in the UK have weakened slightly over time, although by less than in other economies. It also found that levels of business dynamism have fallen, reinforcing the important role of effective competition, productivity, and growth across the whole economy.

**7 The CMA houses specialist subsidy advice (SAU) and UK internal market (OIM) functions**, which provide reporting, monitoring and advice to all levels of government. The SAU's work supports UK, devolved, and local government in delivering important activity to achieve growth and other public policy objectives through subsidy mechanisms. The OIM's work supports national governments seeking to provide regulatory stability for businesses to invest, grow and innovate.

**This year**, the SAU will conduct research and information-gathering to support its periodic report on the operation and impact of the subsidy control regime. The OIM will carry out its statutory functions, including publishing its data strategy roadmap update (in the context of a UK government review of the UK Internal Market Act).

### 4. Evolving the way we work

As an independent competition and consumer protection authority, the CMA is set up to provide long-term stability for those we serve. We will continue to ensure that our work to promote competition and tackle unfair behaviour drives the growth, opportunities and prosperity we all wish to see, with the benefits (both short and long-term) felt by UK consumers and businesses.

Playing our part in delivering these outcomes, including ensuring the UK is a globally attractive place to invest and do business, is not only about the work we do. How we go about it also matters. This is reflected in the draft Strategic Steer, which is clear that we must discharge our duties in a way supports growth and builds business and investor confidence.

Over recent years, we have made consistent progress around prioritisation, streamlining and efficiency of our processes, as well as investing in talent and capability. We have delivered a step-change in open, constructive engagement with all stakeholders, particularly the business and investment community. We have taken strides to become more open and transparent, including enhancing our accountability to Parliament with a four-fold increase in CMA appearances at Parliamentary committees between 2019 and last year.

Our digital and technology capability has surged. We have made a significant investment since 2019 in developing in-house technical capabilities, integrated alongside other disciplines into a new Digital, Technology and Insight Directorate. This has been pivotal to meeting the challenges of increasingly complex investigations, including all major digital cases and proactive work on AI. We have been applying this capability internally by testing innovative AI and data science approaches. We have begun to build out a new 'strategic analysis' capability to deepen our understanding of firms' strategies and business models (including in relation to AI and 'digital ecosystems'). Bringing the voice and perspective of businesses and investors directly into our work is vital to helping create the conditions for innovation, investment and growth.

Whilst much has been achieved in recent years, we are conscious that perceptions of how the CMA operates matter to the UK's global competitiveness today. We are committed to playing our part, delivering a step change this year in the way we operate across all our functions. Some benefits from the positive changes we are implementing may be felt immediately by some stakeholders, whilst others will take time. This section highlights key elements of our plans.

#### The 4Ps

As set out above, we have heard clear feedback from businesses and investors (both domestic and international) that four aspects of how we carry out our work really matter to perceptions of the UK as a great place to do business.

These are:

- Pace
- Predictability
- Proportionality
- Process

We have worked at pace since late last year to deliver carefully considered, meaningful changes based on these 4Ps. We started with merger control, which is where we have had

the most direct feedback from stakeholders, and which we know is particularly important to business and investor confidence.

However, it is clear that these best practice principles are applicable to other areas of our work and we are now making tangible progress across all of these. In particular, in April we will provide further updates on how we are applying the 4Ps framework to the new digital markets and consumer protection regimes introduced under the DMCCA. Updates on markets and competition enforcement will follow later in the year.

#### **External engagement**

More than ever, the CMA recognises the value of pro-active stakeholder engagement. This openness to constructive discussion and continuous feedback must be a part of our organisational DNA. This year we will maintain and deepen relationships with a truly diverse range of stakeholders.

We will continue our critical dialogue with consumer advocacy groups, civil society, academia, and the third sector. As with small businesses, for example, we know it is not always as easy for these groups to engage with the CMA. We welcome the diversity of views and the depth of expertise they can offer, and we are committed to broad and inclusive routes to engagement which take this into account. In particular, regular dialogue with consumer groups (at both senior and working level) is vitally important to our work. The consumer landscape is complex, and these relationships help us better understand and effectively address consumer issues across the UK.

We have been ramping up engagement with businesses of all shapes and sizes – from the largest global firms to challengers, new entrants, entrepreneurs, and investors. The value of this direct engagement with firms themselves (distinct from engagement through advisory firms), has been notable and has helped inform our 4Ps programme. We will continue these regular, constructive discussions – both within and outside the confines of deals or markets we may be investigating.

This includes embedding a truly participative approach in the new digital markets competition regime which is grounded in direct, ongoing and open engagement both with prospective SMS firms and the full set of interested stakeholders from the outset. We expect to draw lessons from this engagement that can be applied across other areas of the CMA's work.

We will continue our regular engagement with diverse industry bodies across the UK economy, including through our new CMA Growth and Investment Council. The Council brings together 12 senior representatives of business, investor and financial interests in service of a common goal: to ensure that effective competition and consumer protection drive innovation, investment, and growth across the UK economy. The Council is now meeting on a regular basis to discuss, agree, and track concrete recommendations (outside of individual cases). We have held one very constructive meeting thus far and received helpful feedback, including a steer to focus our efforts on specific sectors within the Industrial Strategy and to seek opportunities to clarify how the CMA compares to international counterparts.

### Reporting

We are committed to robust competition and consumer protection, enhancing business confidence, and helping to drive growth and investment.

We will be transparent about the impact of our interventions by:

- Reporting on our performance against the delivery of a government target of expected direct financial benefits to consumers of at least ten times its relevant costs to the taxpayer (measured over a rolling three-year period), including breaking this down by our principal tools;
- Assessing the wider benefits of our work, and delivery against our Annual Plan, through published governance documents and broader communications, as well as regular reporting to our sponsor department and Parliamentary committee;
- Specifically reviewing and reporting on how our work has contributed to economic growth in our future Annual Report and Accounts, as well as how we have applied the UK government's new Strategic Steer in practice; and
- Working with DBT to deliver a means of collecting clear feedback from a wide range of stakeholders on how we work (including in relation to the 4Ps), and also reporting on this on an annual basis. This reflects the draft Strategic Steer and will enable us to play back in a more consistent, transparent way what we have heard and how we have acted on it.

# 5. Prioritisation and operations

#### Prioritisation

In any given year, the CMA undertakes a considerable amount of work to deliver our core statutory functions. Across all of these, we make rigorous prioritisation decisions to ensure we can achieve positive outcomes for people, businesses, and the UK economy.

Some of our functions – for example, our markets, consumer and competition enforcement work – provide more flexibility for the CMA to make considered choices about how to prioritise our resources. In other areas, such as the mergers we review in any given year, the CMA has less discretion.

We apply published prioritisation principles to carefully direct our attention and resource:

- Strategic significance: does action in this area fit with the CMA's objectives and strategy?
- Impact: how substantial is the likely positive impact of CMA action?
- Is the CMA best placed to act: is there an appropriate alternative to CMA action?
- Resources: does the CMA have the right capacity in place to act effectively?
- Risk: what types of risks are associated with CMA action, and how significant are they?

As set out in our prioritisation principles, we have regard to the UK government's draft Strategic Steer when we prioritise our work. This includes by giving appropriate consideration to prioritising pro-growth and pro-investment interventions; focussing on markets and harms that particularly impact UK-based consumers and businesses; enhancing business and consumer confidence; and supporting growth and international competitiveness in the Industrial Strategy's eight key sectors. However, the final decisions on individual cases are taken by the CMA, in accordance with the applicable statutory framework.

Separate prioritisation principles inform decisions made in relation to some work undertaken by the OIM and SAU. These are set out in specific guidance on the CMA's approach to these functions.

#### Operations

Building on recent internal change programmes, we are putting in place a targeted threeyear organisational transformation plan to support delivery of the CMA's ambitious programme of work within our funding envelope. HM Treasury has allocated the CMA a funding settlement for 2025/26 which includes a Resource Departmental Expenditure Limit budget (excluding depreciation) of £137.42 million and a Capital Departmental Expenditure Limit budget of £5.1 million.

This plan will ensure the CMA continues to work as effectively and efficiently as possible across all our functions, applying our 4Ps framework of pace, predictability, proportionality and process, harnessing digital transformation, developing our people and capability, and optimising our business operations.

### 6. How the CMA works with other regulators and partners

The CMA shares important responsibilities across both the competition and consumer protection aspects of our role. Our decisions about when and where to act are often informed by these shared responsibilities. We work proactively and collaboratively with partners across the regulatory landscape, advising, guiding, and collaborating, to help ensure the best outcomes for UK consumers and businesses.

Some examples include:

#### **Regulated sectors**

The regulated sectors are critical for people, businesses, and the UK economy. From energy to insurance, broadband to trains, we all rely on essential services in these sectors in day-to-day life, and they form around 20% of household spending.

Effective competition in regulated sectors can drive firms to meet their customers' needs, charge lower prices, operate more efficiently, invest and innovate.<sup>9</sup> There is also a critical interdependence between effective competition and effective consumer protection. We know that for retail markets to work well, rivalry between firms needs to be complemented by consumers empowered to choose between offers. More than that, support for the investments needed in these sectors will depend on both businesses and consumers having confidence and being treated fairly in these markets.

The CMA plays two clearly defined roles in relation to regulated sectors. Firstly, we share concurrent competition and consumer powers with sector regulators. Secondly, we decide on regulatory appeals for certain sectors, where the CMA is likely to undertake a significant amount of work in the year ahead given that multiple companies have challenged the price control introduced through Ofwat's most recent price review (PR24). It is expected that redetermination references will be made by Ofwat to the CMA in March 2025, with a statutory deadline of six months, extendable to 12 months. An independent CMA Panel will make the redeterminations in accordance with the principles that apply to Ofwat (including relevant statutory duties), taking its own view on the balance of duties and the application of these principles to the disputing company's price controls.

The CMA exercises our statutory functions to the best of our ability. At the same time, we recognise that in some sectors there are legitimate questions about how regulation operates and the outcomes it has delivered for consumers and the wider economy. Whether in relation to service quality, network resilience or customer satisfaction, in many instances there is a feeling that the UK could, and should, be doing better. Doing better will also be vital to delivering on the UK government's growth mission; the provision of high-quality, efficient infrastructure underpins the performance of businesses in every part of the economy, reducing costs and increasing productivity. Getting regulation right will be essential to achieving this.

<sup>&</sup>lt;sup>9</sup> In many sectors, whether due to natural monopoly or market failure, normal competitive pressures do not apply. Regulators are key to filling the gap: setting and enforcing standards on services, enabling access to infrastructure, and mandating investments for the future. Competition policy nonetheless has a role to play in the regulated sectors. Even where it is not the most significant factor, it needs to work alongside, and be supported by, regulation to deliver the best outcomes.

Our recently published review of concurrency – ten years on from government's reforms – recommends that the CMA dial-up our co-operation with sector regulators when looking at competition and consumer issues which are broader than illegal anticompetitive conduct. We welcome the opportunity to work with sector regulators to take forward this recommendation, alongside several others in our report.

Together, we can further strengthen the operation of the competition concurrency arrangements and develop new approaches to our shared consumer law powers under the reformed regime. This will be particularly important in the coming year, where the DMCCA will also strengthen sector regulators' hand in discharging their responsibility to promote consumer protection in their sectors, including by enabling them to apply to court to impose penalties.

More broadly, at a moment when government is considering wider reforms to sector regulation (for example, the ongoing Cunliffe Review of the water sector and its regulation), the CMA stands ready to provide advice and support, including on potential longer-term changes to the system of regulatory appeals and our role within it.

#### **Digital regulation**

Designing and implementing digital regulation to address the unique challenges and opportunities of this complex, cross-economy ecosystem requires a coherent, collaborative approach. This is the core purpose of the Digital Regulation Cooperation Forum (DRCF), of which the CMA is a founder member, alongside the Financial Conduct Authority, the Information Commissioner's Office, and Ofcom.

Clarity and coherence of digital regulation, as well as streamlined access to regulatory advice and support, are key to fostering business confidence, innovation and growth in the UK tech sector. Working through the DRCF, the CMA and the other regulators have been able to contribute towards achieving these outcomes. Over the last year, for example, we have collaborated on joint research and DRCF publications, such as on industry adoption of and consumer appetite for the use of Generative AI; the future of the third-party algorithmic auditing market; and insights and opportunities for industry and regulators on emerging technologies such as digital ID and synthetic media.

We also piloted the Al and Digital Hub to assist UK tech innovators to bring new products and services to market at pace. This one-stop service offered expert, informal advice, via the DRCF website, to innovators with complex, cross-regulatory questions. The pilot is currently being evaluated before the DRCF confirms next steps.

The CMA will continue to champion the DRCF's mission objectives in the year ahead, including assuming the role of DRCF rotational Chair around the theme of 'innovation'. Alongside our DRCF partners, we will continue to strive for regulatory cohesion and cooperation, while ensuring UK consumers and businesses gain maximum benefit from innovation and growth in digital markets. Further detail on the DRCF's workstreams for the year ahead will be published in its forthcoming 2025/26 workplan.

#### International cooperation

In a world of interconnected, increasingly borderless markets and uncertainty over shifting trade dynamics, the CMA recognises the importance of working collaboratively with international partners on both competition and consumer protection issues.

Our ability to deliver value for UK consumers and businesses is enhanced by effective international cooperation where markets have cross-country or global dynamics; or where anti-competitive conduct or unfair treatment of consumers extends across borders. For businesses navigating complex international frameworks, this cooperation can support greater certainty, clarity, and expediency of process.

Reflecting the importance of international cooperation, the CMA seeks to maximise opportunities presented by active participation in major international networks, such as the Organisation for Economic Co-operation and Development (OECD), the International Consumer Protection and Enforcement Network (ICPEN), the G7, the United Nations Conference on Trade and Development (UNCTAD) and the International Competition Network (ICN).

The CMA also supports government in the negotiation of cooperation and trade agreements, in relation to sections relevant to competition and consumer policy. In October 2024, the UK and EU formally concluded negotiations on a UK-EU Competition Cooperation Agreement. Barring unforeseen circumstances, the proposed agreement is expected to enter into force in 2025.

The CMA will continue to engage closely in international dialogue this year. In particular, we look forward to hosting the ICN Annual Conference in Edinburgh in May 2025, alongside a meeting of the ICN Technologists Forum. We will use these events to share and understand the latest developments in competition law globally, with a particular focus on the role of competition in driving growth and unlocking technology innovation.

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