

Strategic market status investigation into Google's general search services

**Roadmap of possible measures to
improve competition in search**

24 June 2025

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1. Summary

- 1.1 This Roadmap sets out how we propose to prioritise possible Conduct Requirements and Pro-Competition Interventions, if we reach a final decision to designate Google with SMS in general search and search advertising services. It is intended to give more certainty to Google and other market participants on our planned workstreams. It sets out the areas where we are currently considering taking action, as well as areas that we do not consider as priorities, during the first half of any designation period.
- 1.2 In line with the CMA's prioritisation principles and government's strategic steer, we will focus on targeted interventions that improve market outcomes for consumers and businesses in the UK, also taking appropriate account of measures that have already been taken or are proposed internationally.
- 1.3 The proposed measures set out in this roadmap have two overarching goals. First, to ensure consumers and businesses are treated fairly and can have confidence in the way they interact with Google in search. Second, to promote increased competition and innovation through targeted actions, such as ensuring that all firms (including Google) can compete and innovate in new AI-based search interfaces.
- 1.4 We are setting out a phased approach for any action we may take.
- 1.5 Category 1 measures, which we are aiming to consult on in the autumn, include early priorities which we would expect to deliver some of the quickest benefits for UK businesses and consumers. These focus on greater choice and control, including through:
 - **Choice screens** – Ensuring people can easily choose and switch between search services (including potentially AI Assistants), by making default choice screens a legal requirement.
 - **Fair ranking principles** – Ensuring Google's ranking and presentation of search results is fair and non-discriminatory, and making sure there is an effective process for raising and investigating issues.
 - **Publisher controls** – Ensuring publishers have effective transparency, attribution and choice in how their content collected by Google for search is used in AI-generated responses, including AI Overviews and Gemini AI Assistant, without affecting if and how they appear in Google Search.
 - **Data portability** – Helping innovative new businesses to bring products and services to market by ensuring people can transfer their data (such as their search history).

- 1.6 Category 2 measures are those for which there may be a case for action but which require further consideration, and potential interventions may be more complex to develop. We will continue our evidence gathering, stakeholder engagement and analysis to consider the best and most proportionate approach. These issues include: **publisher concerns** about the impact of Google's bargaining position, and whether they are receiving fair and reasonable terms (including payment terms); concerns from **specialised search services** that they are not treated fairly by Google; and concerns about transparency and control in relation to **search advertising**.
- 1.7 In Category 3, we have identified those measures that we have deprioritised for the first half of the designation period. These include measures relating to consumer control over use of their data; restrictions on Google's ability to share data within its ecosystem; and measures on ad load, auctions and ad prices. We may revisit the case for intervention in these areas as we update the Roadmap for the second half of the designation period, based on our analysis (and any relevant market developments) at that time.
- 1.8 We have identified a further set of possible actions (for example, restricting use of default agreements and providing access to underlying search data) which are currently the subject of live litigation between the US Department of Justice and Google. We will consider our approach in these areas in light of developments over the coming months. This is in line with the CMA's prioritisation principles and the government's recent strategic steer, which encourages the CMA to consider where we are best placed to act.
- 1.9 It is important to emphasise that the Roadmap is an indicative prioritisation document; it does not set out the evidence or reach a view on measures that should be put in place. We can only introduce measures where these would be effective and proportionate to address an issue. In line with our participative approach, we will continue to engage with a broad range of stakeholders as we clarify our views on appropriate interventions over the next few months and will provide an updated version of the Roadmap in early 2026.
- 1.10 Should stakeholders have views on the Roadmap, they can be provided via email at searchsms@cma.gov.uk. Any such views will be considered alongside ongoing engagement with stakeholders, ahead of updating the Roadmap in early 2026.

2. Introduction, context and legal framework

- 2.1 Google's general search services are central to how people in the UK access and navigate the world wide web. UK citizens inputted hundreds of billions of queries to Google every year.¹ Google is also a critical route through which UK businesses reach consumers. Google earned revenues of more than £10 billion in the UK in 2024 from search advertising, and more than 200,000 UK advertisers used Google's search advertising.² Google's search services are therefore of significant importance to the UK economy and society more broadly.
- 2.2 We want to ensure that search services work well for people and businesses in the UK, and support innovation and growth in the wider UK economy. We want to do this through supporting choice and innovation for users and value for money for the businesses who buy search advertising.
- 2.3 This Roadmap sets out how we intend to prioritise our work to deliver these outcomes through possible measures with respect to Google's general search and search advertising services (together general search services) under the digital markets competition regime. The Roadmap sets out our proposals for the first half of the 5-year designation period, should Google be designated as having Strategic Market Status (SMS) (see below). It is a proactive step we are taking, over and above our obligations under the Digital Markets, Competition and Consumers Act 2024 (the **Act**)³, to provide additional clarity on the types of interventions we expect to consider and the expected timeframes for developing them.
- 2.4 The Roadmap aims to give as much clarity as possible about the areas we plan to focus on in the first half of the designation period. We expect to provide an update to the Roadmap in early 2026 to confirm our plans. This update will take into account developments in other jurisdictions, as well as views from stakeholders on our proposed plans. Following this, we intend to revisit the Roadmap at the start of the second half of the designation period, and may set out any further or different measures if we think they are necessary, based on our analysis (and any relevant market developments) at that time. For example, we may need to revisit our approach if:

¹ [CMA's proposed decision to Google as having strategic market status in respect of general search and search advertising services](#), 24 June 2025 (SMS Proposed Decision), paragraph 5.237.

² [SMS Proposed Decision](#), paragraph 5.238.

³ [Digital Markets, Competition and Consumers Act 2024](#) (the Act).

- market circumstances change or new evidence of a concern emerges;
- Google's conduct changes in a way which creates a need for further measures;
- there are developments in other jurisdictions that have implications for our interventions; or
- our interventions do not have the anticipated effect and we consider that we need to take further or different action to address concerns.

2.5 More generally we will keep our approach to interventions under review. If we receive compelling evidence for a change in our approach we will give it careful consideration.

2.6 The rest of this document sets out:

- a) a summary of Google's position in general search services, and our strategic objectives when considering possible measures we might take under the digital markets competition regime;
- b) the legal framework and prioritisation approach for interventions;
- c) our current view on how we will prioritise interventions; and
- d) next steps, including how stakeholders can provide their views on the sequencing of our work.

Google's position in general search services and our strategic objectives

2.7 The Proposed SMS Decision we are consulting on today sets out the analysis supporting our provisional view that Google has SMS in general search services.⁴ Through our investigation thus far, we've heard widespread concerns, including:

- Google's index of billions of websites, its access to trillions of historical searches, and its ecosystem of information, are extremely hard for others to replicate.
- Competition in search advertising is not working as effectively as it should. The amount spent by UK business entities for search advertising on

⁴ [SMS Proposed Decision](#).

Google last year was equivalent to more than £33,000 per advertiser. If competition was working well, we would expect these costs to be lower.

- Google may not consistently provide fair search ranking and is able to rapidly (and with limited transparency over when or why) introduce changes to ranking and presentation of results which affect businesses' ability to reach customers.
- Google's bargaining position can impact fair and reasonable terms for publishers, including fair payment terms for the use of their content. Insufficient controls about how their content is used in Google Search (including AI Overviews) also limits news publishers' ability to monetise their content.
- Google's deals with companies like Apple and Samsung to be the default search engine on their devices can make it more difficult for competitors to reach customers.
- Innovative businesses struggle to compete as people can't easily share their search data with firms developing innovative new services which could benefit them.

2.8 These issues are likely to harm UK businesses through higher costs and reduced innovation, as well as UK consumers through less choice and control.

2.9 As set out in the Proposed SMS Decision, the emergence of new AI assistants and AI-based search services such as ChatGPT, Perplexity and Google's own Gemini AI assistant is changing the ways users find information online. This market disruption could ultimately help create a more competitive market. However, entrants also face many of the same barriers that have been faced by traditional search competitors to Google over a long period: for example, in terms of the availability of key data and to the access points through which they can reach users.⁵

2.10 It is important to ensure that new AI-based search competitors are able to develop on a level playing field with Google, to maximise the potential for innovation and new entry across general search services. At the same time, we recognise that Google should itself be able to compete strongly in new

⁵ [SMS Proposed Decision](#), paragraph 5.222- 5.226.

areas such as AI assistants. We want to stimulate Google's own innovation in new products rather than stifling it.

2.11 Given this context, our strategic objectives are to:

- Ensure consumers and businesses are treated fairly and can have confidence in the way they interact with Google in search.
- Promote competition and innovation through targeted actions, such as ensuring that all firms (including Google) are able to compete and innovate in new AI-based search interfaces.

International and UK regulatory context

2.12 The UK is one of a number of jurisdictions around the world taking action to support businesses and consumers through open and innovative digital markets. Relevant measures have been imposed, or are under consideration, in other jurisdictions, including:

- **The ongoing United States and State of Colorado vs Google LLC case**, in which a remedies judgment is expected in the next few months.
- **In the EU, Google's compliance with the Digital Markets Act (DMA)** in relation to its designation as a gatekeeper for its online search engine and online advertising 'core platform services'.
- **In Japan, the implementation of the Mobile Software Competition Act**, under which Google is designated as a specified software operator.
- **In jurisdictions such as Canada and Australia, measures to ensure publishers are remunerated** by digital platforms for use of their content.

2.13 In line with our prioritisation principles and the government's strategic steer to the CMA,⁶ we are closely observing these developments and others around the world. We will prioritise measures which complement international action, where this will deliver benefits for UK businesses and consumers.

2.14 We are also aware of the interactions between our work in search and work being undertaken by the UK government, including in relation to copyright

⁶ [CMA prioritisation principles](#), 30 October 2023; [Strategic steer to the Competition and Markets Authority](#), Department for Business and Trade, 15 May 2025.

and AI,⁷ as well as the work of other UK regulators. We will engage with these bodies to ensure we effectively manage the interactions with their work and benefit from their expertise.⁸

The legal framework and our prioritisation approach

- 2.15 The Act enables the CMA to introduce interventions on designated firms in the form of Conduct Requirements (**CRs**) or Pro-Competition Interventions (**PCIs**).
- 2.16 We will only intervene where there is evidence that it would be effective and proportionate to do so. Before being imposed, any potential CRs or PCIs will be subject to careful assessment and public consultation, in accordance with the processes and legal framework set out in the Act and our guidance.⁹
- 2.17 CRs can only be imposed for the purposes of one or more of the following statutory objectives:¹⁰
- **Fair dealing:** that users or potential users¹¹ of the relevant digital activity are treated fairly and able to interact, whether directly or indirectly, with the undertaking on reasonable terms;
 - **Open choices:** that users or potential users of the relevant digital activity are able to choose freely and easily between the services or digital content provided by the undertaking and services or digital content provided by other undertakings; and
 - **Trust and transparency:** that users or potential users of the relevant digital activity have the information they require to enable them to:

⁷ [Copyright and Artificial Intelligence Consultation](#), Intellectual Property Office, Department for Science, Innovation and Technology, and Department for Culture, Media and Sport, 17 December 2024.

⁸ Further information on how the CMA will engage with other regulators in relation to digital markets is set out in published [Memoranda of Understanding](#).

⁹ [Digital markets competition regime guidance](#), December 2024 (**CMA194**).

¹⁰ Sections 19(5)-19(8) of the Act.

¹¹ 'Users' means any users of the relevant service or digital content, and includes any person, legal or natural: section 118(1) of the Act. This is to be understood in very broad terms to include a person or business that interacts in any way with the relevant digital activity, at any level of the supply chain: explanatory notes to the Act, paragraph 533(f).

- (i) understand the services or digital content provided by the undertaking through the relevant digital activity, including the terms on which they are provided, and
 - (ii) make properly informed decisions about whether and how they interact with the undertaking in respect of the relevant digital activity.
- 2.18 CRs must also be of a 'permitted type' set out in an exhaustive list in the Act (for example, requirements to trade on fair and reasonable terms, refrain from restricting interoperability or not use data unfairly).¹²
- 2.19 PCIs can only be imposed following a further investigation that identifies an adverse effect on competition arising from factors relating to a digital activity in which a firm has been designated with SMS.¹³
- 2.20 Any CR or PCI must be proportionate for the purpose for which it is imposed. This means it must:
 - be effective in achieving its intended aim;
 - be no more onerous than it needs to be to achieve that aim;
 - be the least onerous measure, where there are multiple equally effective options; and
 - not produce disadvantages disproportionate to its aim.

Our prioritisation approach

- 2.21 As noted in our published guidance,¹⁴ and as expanded on in our paper 'Delivering the 4Ps under the digital markets competition regime' published in April 2025,¹⁵ the CMA will have regard to its Prioritisation Principles¹⁶ when considering whether and how to intervene in digital markets, informing our decisions about which issues to tackle and which interventions to select.

¹² Section 20 of the Act.

¹³ Section 46 of the Act.

¹⁴ [Digital markets competition regime guidance](#), December 2024 (CMA194). See chapter 3 (Conduct Requirements) and chapter 4 (Pro-Competition interventions) for further information.

¹⁵ [Delivering the 4Ps under the digital markets competition regime](#), 30 April 2025.

¹⁶ [CMA prioritisation principles](#), 30 October 2023.

There are five principles the CMA will consider to ensure it delivers the regime effectively and proportionately:

- **Impact:** The CMA will prioritise those interventions which have a clear and beneficial impact for UK consumers, businesses and the UK economy.
- **Strategic significance:** As part of considering whether the action fits with the CMA's objectives and strategy, it will prioritise pro-growth and pro-investment interventions, and those which can support growth and international competitiveness in the growth-driving sectors identified in the government's industrial strategy.
- **Whether the CMA is best placed to act:** The CMA will consider the interplay of digital markets issues with the actions of other regulators and government bodies domestically and internationally.
- **Risk:** The CMA will rate as high-risk interventions where the overall impact is unlikely or highly uncertain, or there is a high risk of unintended effects.
- **Resources:** The CMA will rate an intervention as requiring high resources where significant resource from the CMA is needed to design, implement, monitor or enforce it.

2.22 Having applied the prioritisation principles, we have grouped the interventions we are considering into four categories:

- **Category 1 Interventions:** CRs we expect to consult on shortly after we issue any final decision to designate Google with SMS, in autumn 2025. These are areas where we consider there is likely to be a strong case for intervention and where the CMA is well placed to act quickly, accounting for the potential impact, strategic significance, resource and risks of intervening.
- **Category 2 Interventions:** Potential CRs or PCIs on which we think there may be a case for action, but where issues require further consideration, and potential interventions may be more complex to develop. Subject to our further analysis, we will aim to consult (in the case of CRs) or launch investigations (in the case of PCIs) from the first half of 2026 onwards.
- **Category 3 Interventions:** Potential CRs or PCIs which we do not expect to pursue in the first half of Google's SMS designation period. These may relate to areas where we do not currently consider there is a case for intervention, or where we would only seek to pursue measures at a later date, should our priority interventions not address issues as we intend. Depending on our assessment of the evidence at the time, we may revisit

the case for intervention in these areas as we update the Roadmap for the second half of the designation period.

- **Areas where we are still considering prioritisation, subject to international developments:** Some potential interventions may be impacted by developments in other jurisdictions, in particular the ongoing US litigation (see above). We have not placed those potential interventions into the categories above at this stage. We expect to confirm our approach to these interventions in the updated Roadmap in early 2026. In line with the CMA's prioritisation principles and the government's strategic steer to the CMA, we will ensure any parallel regulatory action in these areas is timely, coherent and avoids duplication where these parallel actions effectively address issues arising in the UK.¹⁷

- 2.23 In coming to a view on prioritisation, we have been informed by our ongoing engagement with businesses, consumer and civil society groups, and industry experts, as well as responses to our invitation to comment¹⁸ and our evidence requests to parties. At the outset of the SMS investigation, we held roundtables with affected stakeholders including publishers, specialised search services, and advertisers. In total we have heard from around 150 parties, collecting views on Google's position in general search services, potential interventions, and how these interventions should be prioritised.
- 2.24 In this document we have referred to the Proposed Decision document and other publicly available evidence to provide examples of the evidence supporting our prioritisation. However, our thinking has been informed by the full range of detailed evidence we have gathered in the course of the investigation. We will set out the evidence in more detail when we consult on, or launch investigation into, each specific intervention.
- 2.25 As we develop the detail of our approach we will continue to consider the evidence and engage with a wide range of parties via workshops, bilateral meetings and other routes to ensure any interventions take into account a wide range of perspectives.

¹⁷ [Strategic steer to the Competition and Markets Authority](#), Department for Business and Trade, 15 May 2025.

¹⁸ [Public responses](#) to the Invitation to Comment, dated 14 January 2025.

3. The Roadmap in respect of Google's general search services

- 3.1 This section sets out how we are proposing to prioritise the assessment of possible interventions and when stakeholders can expect to input into the CMA's detailed consideration of these issues.
- 3.2 Figure 1 summarises our proposed prioritisation. The following sections provide more detail on why particular interventions have been grouped into each category.

Figure 1: Overview of prioritisation of potential measures

Prioritisation category	Potential measures
Category 1: CRs we expect to consult on shortly after issuing any final decision to designate Google with SMS, in autumn 2025	<ul style="list-style-type: none"> • Ensuring UK consumers can easily choose and switch between search services (potentially including AI assistants), including through choice screens • Ensuring effective data portability mechanisms for consumers to support competition and innovation • Fair ranking principles and effective complaints process for businesses listed in search • Ensuring transparency, attribution and choice for publishers in how their content, collected for search, is used in Google's AI services
Category 2: Potential CRs or PCIs on which, subject to our further analysis, we will aim to consult (for CRs) or launch investigations (for PCIs) from the first half of 2026 onwards	<ul style="list-style-type: none"> • Fair treatment of specialist search services • Fair and reasonable terms in relation to use of publisher content • Greater transparency of search advertising for advertisers and consumers
Category 3: Potential CRs or PCIs which we do not expect pursue in the first half of Google's SMS designation period	<ul style="list-style-type: none"> • Measures relating to consumer control over use of their data • Restrictions on Google's ability to share data within its ecosystem • Measures on ad load, auctions and ad prices
Areas where we are still considering prioritisation, subject to international developments. Categorisation to be confirmed in update to Roadmap in early 2026	<ul style="list-style-type: none"> • Addressing barriers to entry and expansion posed by Google's distribution agreements with OEMs, MNOs, Browser Vendors and other parties • Requiring sharing of certain data with search competitors to support competition and innovation • Ensuring fair, reasonable and non-discriminatory access to ad syndication and addressing barriers to entry and expansion in search advertising

Category 1: Potential conduct requirements for consultation in autumn 2025

- 3.3 The following are issues we are prioritising with the aim of consulting on potential CRs shortly after issuing any final decision to designate Google with SMS in autumn 2025. They are areas where we consider there is a strong case for action to address immediate concerns market participants have raised with us, and where the CMA is well placed to act quickly, accounting for the potential impact, strategic significance, resource and risks of intervening. In several cases they build on solutions that Google has already implemented in other countries, or has introduced on a voluntary basis in the UK but where there would be benefit for businesses and consumers in underpinning this with a specific CR.

Ensuring UK consumers can easily choose and switch between search providers

- 3.4 Presenting consumers with timely, clear and balanced choices about which search services they use is an important driver of effective competition. Some UK users are already presented with a choice screen to enable them to select their default search engine when setting up Android devices for the first time, while most users can in principle change their default search engine after the device is set up either via browser or device settings. We want to ensure that these choices are offered to as many users as possible, at the right time, and with the information they need to support effective choice by users. Such measures could pursue the statutory objective of open choices.
- 3.5 We therefore expect to consult on imposing a choice screen obligation on key access points, such as Chrome and Android, as part of our initial set of CRs, building on the action already taken by Google to support consumer choices in the UK and EU. As part of this, we will consider whether options listed on choice screens should include AI assistants. We will also set high-level principles for effective choice architecture to ensure Google displays balanced and well-designed user interfaces.

Ensuring effective data portability for consumers' data

- 3.6 We expect to consult on a data portability requirement, to enable consumers to freely and easily move data (such as their search history) from their use of Google search to other businesses. This could help innovative new businesses to bring products and services to market. The measure would

build on similar requirements imposed under the DMA in the EU,¹⁹ and the more general right to data portability under data protection law,²⁰ and could pursue the statutory objectives of fair dealing and open choices.

- 3.7 Google already makes provision for data portability on a voluntary basis in the UK. Ensuring that this is backed by a CR would give businesses developing new innovative products that rely on effective data portability greater certainty, allowing them to invest and grow.

Ensuring fair ranking and an effective complaints procedure for businesses listed in search

- 3.8 Businesses and other parties need to have confidence that their ranking and presentation in search results is driven by relevance to the user query, and that they are not subject to undue discrimination. We therefore want to establish a ‘fair ranking principles’ requirement on Google to give users confidence that Google’s ranking and presentation of search results is fair and non-discriminatory. This could pursue the statutory objectives of trust and transparency and fair dealing.
- 3.9 We will also consider the applicability of these fair ranking principles to related issues touched on elsewhere in this document, such as the presentation of Google’s services in relation to competing specialised search services, and how Google differentiates organic results and ads. We intend to consult on these fair ranking principles as part of our initial set of CRs.
- 3.10 When businesses think they have been treated unfairly in search – for example through the application of Google’s policies, such as Google’s SafeSearch²¹ or Site Reputation Abuse²² policies – there should be an appropriate mechanism for them to raise concerns with Google and ensure these concerns are addressed. This needs to be done in a way that does not impose undue burdens on Google: for example, any changes to ranking policy are likely to have winners and losers and the number of potentially affected parties is very large. However, where there are legitimate concerns that policies have not been applied consistently or correctly, businesses should have a route to ensure complaints are properly addressed. To that

¹⁹ Data portability is a requirement under Article 6(9) of the DMA.

²⁰ See the right to data portability under Article 20 of the UK General Data Protection Regulation.

²¹ See for example, [LoveHoney’s](#) response, dated 31 January 2025, to Invitation to Comment, page 3.

²² See for example, [Association of Online Publishers’](#) response, dated 29 January 2025, to Invitation to Comment, page 1.

end, as part of our initial set of CRs, we intend to consult on a requirement on Google to maintain an effective complaints process. This could pursue the statutory objective of fair dealing.

Ensuring transparency, attribution and choice for publishers in how their content, collected for search, is used in Google's AI services

- 3.11 Publishers have raised concerns for some time about how Google's position as a key gateway gives it significant bargaining power over the way their content is used in search, and the terms that Google offers. In 2022, the CMA and Ofcom published advice to the UK government that examined some of these concerns, by considering how a new digital markets competition regime could apply to the relationship between platforms and content providers.²³
- 3.12 More recently these concerns have focused on the use of publishers' content for the training and refinement of AI models and the grounding (providing more up-to-date and 'real world' information to improve accuracy and relevance) of responses produced by those models.²⁴ Search results can be used by AI to create summaries as part of search (eg AI Overviews) and in other products (eg Google's Gemini assistant). This is a complex area where the rights of content owners and the need to support innovation that consumers value must be balanced. We will therefore take careful account of the wider context – including potential changes to the UK copyright regime being considered by the UK government²⁵ – in considering interventions in this area. We can only act where concerns relate to Google's position in search – recognising that is only one aspect of publishers' broader concerns – and where a CR would be a proportionate way of addressing the concern.
- 3.13 Reflecting this context, we intend to prioritise potential measures to ensure that publishers have effective transparency and control in relation to how their content, when it is collected for search, is used in AI-generated responses in services such as AI Overviews and Gemini assistant; and also that publisher content is accurately attributed within search. For example, this could ensure that publishers can exercise controls over the use of their content for AI-generated responses without it affecting whether or how they

²³ CMA and Ofcom's [advice to DCMS on how a code of conduct could apply to platforms and content providers](#), 6 May 2022.

²⁴ See for example, [Professional Publishers Association's](#) response, dated 3 February 2025, to Invitation to Comment, page 2.

²⁵ [Copyright and Artificial Intelligence Consultation](#), Intellectual Property Office, Department for Science, Innovation and Technology, and Department for Culture, Media and Sport, 17 December 2024.

appear in search results. This measure would pursue the statutory objectives of fair dealing and trust and transparency.

Category 2: Measures we will consider from the first half of 2026

- 3.14 This category includes potential CRs or PCIs on which we think there may be a case for action, but where issues require further consideration, and potential interventions may be more complex to develop. Subject to our further analysis, we will aim to consult (in the case of CRs) or launch investigations (in the case of PCIs) in these areas from the first half of 2026 onwards.

Ensuring fair treatment of competitor specialised search services

- 3.15 The evidence we have reviewed has underlined the important impacts that Google can have on some competitor businesses based on how it displays and ranks different content – including its own services – on the search engine results page (**SERP**).
- 3.16 Google's display of its own services on the SERP can provide users with value by surfacing key information they are looking for when searching the web. However, there may be instances where this conduct could lead to negative outcomes for users: for example, by not giving equal prominence to inputs from third-party services that consumers may value and hence reducing innovation, choice and quality for consumers when they are making online purchases.
- 3.17 Our objectives are therefore to ensure that Google treats competing services fairly and delivers the most relevant information to users on an equitable basis, delivering the best outcomes for consumers – in pursuit of the statutory objectives of fair dealing and open choices.
- 3.18 One area where concerns have been raised is in relation to specialised search services, such as shopping, travel and accommodation comparison services.²⁶ We intend to do further work to identify whether there are specific interventions which can address the concerns in relation to specialised search services without disrupting the value to users created by Google. The need for specific measures will depend in part on how effective

²⁶ See for example, [Checkatrade's](#) response, dated 31 January 2025, to Invitation to Comment, page 3; [AITO's](#) response, dated 3 February 2025, to Invitation to Comment, page 1; [Skyscanner's](#) response, dated 3 February 2025, to Invitation to Comment, page 3.

fair ranking principles (see Category 1 measures above) are in addressing these concerns.

- 3.19 We have also heard some concerns in relation to AI Overviews. For instance, by surfacing AI generated responses to search queries Google might be able to provide more favourable treatment of its own AI services (eg Gemini AI assistant) than competitor AI services. However, we have not seen evidence to support this concern, and we therefore do not intend to prioritise this as a specific intervention area.

Ensuring fair and reasonable terms in relation to the use of publisher content

- 3.20 As noted above, UK publishers have raised concerns about the impact of Google's bargaining position on the terms of use of publisher content in search. These concerns have recently grown with the development of AI Overviews, which may reduce the rate at which consumers click through to publisher websites and hence affect publishers' ability to monetise their content.²⁷
- 3.21 We plan to develop our analysis of the terms and conditions – including both payment and non-payment terms – that Google offers to publishers when using their content. The aim of any intervention in this area would be to ensure that Google is providing fair and reasonable terms, in pursuit of the statutory objective of fair dealing. Given the rapid nature of generative AI developments, we have prioritised certain pressing non-payment terms in Category 1 which may aid publishers to secure fairer terms. Beyond these initial measures, to a longer timetable we intend to consider both the payment terms that Google offers for use of publisher content as well as further complementary non-payment terms in the round. The latter could for example involve deeper transparency measures such as access to additional categories of data on how publisher content is used.
- 3.22 Addressing this issue in Category 2 will enable us to take account of interactions with the government's work on AI and copyright and will ensure we can undertake the analysis required to support any action in this complex area.

²⁷ See for example, [Professional Publishers Association's](#) response, dated 3 February 2025, to Invitation to Comment, page 21.

- 3.23 As part of this work, we will consider the results of recent analysis conducted by Google and other parties on the value of news content to Search.²⁸ We will also look to understand how the presentation of new generative AI services such as AI Overviews alongside search results impacts the exchange of value between Google and publishers.
- 3.24 We understand that concerns identified previously²⁹ that Google was imposing pressure on publishers to use the AMP format to display their content no longer apply as Google has removed the requirement for publishers to use AMP in order to appear, for instance, in the Top Stories carousel (or any other parts of Google Search). We are therefore not intending to consider action in relation to AMP under these potential measures.

Ensuring greater transparency of search advertising for advertisers and consumers

- 3.25 We want to ensure that Google is treating both consumers and advertisers fairly in relation to search advertising. For advertisers, this will ensure that they can secure value for money – in pursuit of the statutory objectives of fair dealing and trust and transparency. Improving the value for money of advertisers' search ad spend could lower costs for businesses across the UK economy, supporting economic growth.
- 3.26 A priority we have identified through our analysis so far is ensuring that advertisers have appropriate transparency and control over their participation in search ad auctions. For example, we want to ensure that advertisers are able to control where their ads appear, including which keywords their ads appear next to, or which Google or partner services their ads are placed on.³⁰ Further, to provide advertisers with confidence that Google is not unduly influencing ad auction processes to increase winning bid prices, we want to consider improving the transparency of Google's operation of the ad auction process. We also want to ensure that advertisers

²⁸ See Google, [EU 2025 Report on the value of news content](#), 18 March 2022, accessed by the CMA on 16 June 2025; and PINF, [£2.2 billion: the value of news to Google in the UK](#), January 30 2025 accessed by the CMA on 16 June 2025.

²⁹ The Online Platforms and Digital Advertising Market Study, pointed to concerns that Google was imposing pressure on publishers to use the AMP format to display their content – for example, by making the use of AMP a criterion for inclusion in the 'Top Stories' carousel: [Online platforms and digital advertising market study](#), July 2020, page 306.)

³⁰ See for example, [AITO's response](#), dated 3 February 2025, to Invitation to Comment, page 2.

get useful data on the performance of their ads, enabling them to refine their future spending.

- 3.27 We also want to consider measures to improve the transparency of how ads are presented to consumers on the SERP, in pursuit of the statutory objective of trust and transparency. Consumers may not always be able to identify that some links, typically appearing at the top of the SERP, are ads.³¹ This could divert consumers' attention away from organic links, potentially resulting in fewer clicks on them. Advertisers may then need to pay more to compete for these top ad-slots to ensure they continue to receive traffic. We are therefore considering whether to introduce transparency requirements on how ads are presented in order to improve consumers' ability to accurately identify organic links, thereby reducing pressure on advertisers to secure ad slots at the top of the page.

Category 3: Issues that we are not currently prioritising

- 3.28 This section highlights issues which we do not expect to pursue in the first half of Google's SMS designation period. These include areas where we do not currently consider there is a case for intervention, or where we would only seek to pursue interventions at a later date should our priority interventions not address the issues as intended. Depending on our analysis at the time, we may revisit the case for intervention in these areas as we update the Roadmap for the second half of the designation period.
- 3.29 The fact that we are not prioritising measures in these areas does not mean that we have concluded that there are no concerns or that intervention would not be warranted. It is rather a reflection of the need to prioritise the CMA's action and focus on areas where we can have the greatest impact on UK consumers and businesses.

Measures relating to consumer control over use of their data

- 3.30 We expect users to have meaningful controls over how their data is collected and used. Our evidence gathering to date suggests that, while there may be targeted areas where Google's choice design could be improved, we should not prioritise intervention in this area. However, we will consider how our design of interventions in other areas should have regard to effective

³¹ See for example, [Checkatrade's](#) response, dated 31 January 2025, to Invitation to Comment, page 7; Lewandoski, Dirk et al (2018), '[An Empirical Investigation on Search Engine Ad Disclosure](#)', Journal of the Association for Information Science and Technology, pages 420-437; and Varn, '[The latest Google Ads Research from Varn 2022](#)', 22 September 2022, accessed by the CMA on 7 May 2025.

consumer choices and may include some targeted requirements where these improve the effectiveness of these interventions. We welcome continued dialogue with Google about how they can ensure their choice design represents best practice and will work with the Information Commissioner's Office (ICO) in light of the interactions with UK Data Protection law.

- 3.31 Similarly, we do not intend to prioritise broad restrictions on the collection and use of consumer data across Google's ecosystem in the absence of specific user consent. We have not yet seen sufficient evidence in support of such a requirement and are mindful of the potential risks to innovation and users' experience of Google's services of such an intervention.

Restrictions on Google's ability to share data within its ecosystem

- 3.32 We have considered the case for limiting Google's ability to share the data it collects through its search activities with its different products and services. As set out in the SMS Proposed Decision, Google's ability to combine data sources from its wider ecosystem of services is one of the data advantages that sustains its market power.³² Preventing the sharing of such data across its ecosystem could further mitigate the risks of Google leveraging that market power into new areas.
- 3.33 We are minded to deprioritise interventions that would impose broad restrictions on cross-service data sharing across Google's ecosystem: we have not seen evidence that the benefits would outweigh the potential risks to innovation and the user experience. We will, however, continue to consider the case for more targeted restrictions in relation to specific risks (including potentially through our work on fair treatment of specialist search services and on the barriers imposed to competition by Google's access to data).

Measures on ad load, auctions and ad prices

- 3.34 We have considered the case for restrictions on the number of ads presented on the SERP to reduce the pressure on businesses to bid to secure ad slots. If Google increases the number of ads shown at the top of the page, organic results could be pushed further down the page, potentially resulting in fewer clicks on them. This could increase the pressure on businesses that would have appeared at the top of organic results to buy

³² [SMS Proposed Decision](#), paragraphs 5.170 and 5.187.

ads so that they still appear at the top of the page. One approach to addressing this issue would be to place restrictions on the number of ads Google can show or how they appear relative to organic links.

- 3.35 However, our view is that such restrictions would be complex to design (especially with other features, such as AI Overviews, also affecting the presentation of the SERP) and could potentially be distortive. We have not yet identified sufficiently compelling evidence in support of such an obligation. We therefore do not intend to prioritise intervention in this area. Measures to ensure a clear distinction between search ads and organic results (discussed in paragraph 3.27) have some potential to address these issues.
- 3.36 We have also reviewed concerns that Google's design and operation of the ad auction itself could be having the effect of inflating ad prices. We have considered whether we should require Google to change the operation of the auction, to ensure it operates fairly. However, we are not minded to prioritise intervention in this area: the ad auctions are complex (eg auctions occur continuously, are determined by multiple dynamic factors, feature real-time bid adjustments and both manual and automated bidding strategies) and the scope for ineffective interventions or unintended consequences could be high. We also think our proposed intervention to improve transparency and control for advertisers could mitigate some of the risks in this area.
- 3.37 Aside from concerns about Google's operation of ad auctions, the lack of viable alternatives for advertisers buying search ads may force advertisers to bid more aggressively in Google's search ad auctions, pushing up the cost of search advertising. This could in theory support the case for targeted price regulation. However, we do not intend to prioritise work on this area, due to the potentially distortive nature of such interventions, as well as their technical complexity (bearing in mind the complexity of the auction process, as set out above). This means any intervention would have significant risk of unintended consequences.

Areas where we are still considering prioritisation, subject to international developments

- 3.38 Given the global nature of Google's search business, some of the issues we are considering – particularly measures to address barriers to entry for search competitors to Google – interact closely with developments in other jurisdictions, in particular the ongoing US litigation. In line with the CMA's prioritisation principles and the government's strategic steer to the CMA, we will ensure that any parallel action we take is timely, coherent and avoids duplication where these parallel actions effectively address issues arising in

the UK.³³ As a result, we have not yet categorised those potential interventions we consider to be most impacted by these wider developments.

3.39 Some of the key interactions relate to potential barriers to competition and innovation in general search. As set out in the SMS Proposed Decision, our analysis suggests that competitors to Google in search face several significant barriers to competing and innovating:

- **Consumer choice and defaults** – it is difficult for entrants and smaller competitors to gain a foothold in the market because of a lack of active choice by consumers. Google Search continues to be pre-installed, placed prominently and set or selected as the default search provider on most search access points; and choice architecture does not make it easy for consumers to change search provider.³⁴
- **Data advantages** – Google benefits from greater scale and scope of data than its rivals, which enables it both to improve the quality of its search results and to more effectively target and measure advertising. Third-party evidence and Google’s internal documents suggest that these data advantages create a significant challenge for new entrants and smaller competitors.³⁵
- **Advertising scale** – advertisers told us that Google’s scale and data give it a significant advantage over its rivals in providing search advertising. Our initial analysis suggests that there may be financial and technical barriers to competitors building platforms that can compete with Google in search advertising, particularly for start-ups and smaller firms in the early stages of their development.³⁶ Linked to this, our initial analysis identified that terms in ad syndication agreements may limit the extent to which certain rivals can compete with Google.³⁷

³³ [Strategic steer to the Competition and Markets Authority](#), Department for Business and Trade, 15 May 2025.

³⁴ [SMS Proposed Decision](#), paragraphs 5.154.

³⁵ [SMS Proposed Decision](#), paragraphs 5.170 and 5.187.

³⁶ [SMS Proposed Decision](#), paragraphs 5.185.

³⁷ [SMS Proposed Decision](#), paragraph 5.177.

3.40 While these barriers have applied to traditional search competitors for some time,³⁸ our initial assessment is that they can also apply to new AI-based search competitors, although in slightly different ways. For example:

- In relation to demand side barriers, there are concerns that existing revenue sharing and placement agreements for search could make it more difficult for AI assistants to make similar agreements with OEMs to be placed prominently on a device.³⁹
- In relation to data barriers: Google's access to many types of data is one significant competitive advantage that Google has over competing AI Assistants, with access to data potentially becoming a more important barrier to entry and expansion for competing AI assistants in future as the user experience becomes more personalised.⁴⁰

3.41 Interventions to address these issues are under consideration as part of the ongoing US litigation, including:

- **Interventions in relation to Google's distribution agreements** with OEMs, MNOs, Browser Vendors and other parties.⁴¹
- **Data sharing obligations** –a range of different potential data sharing obligations are under consideration, including click and query data sharing, index-sharing and data syndication remedies.⁴²
- **Ads syndication arrangements and measures to address barriers to competition in search advertising** – potential remedies include requirements on Google to provide syndicated access to search text ads to qualified competitors and to remove barriers to competition from competing search ad platforms.⁴³

3.42 We will consider our approach to possible intervention in these areas in light of the remedies judgment in the US litigation, expected in the next few months. We would need to carefully consider whether the CMA is best placed to act in these areas, in line with our prioritisation principles and the

³⁸ See for example, [Online platforms and digital advertising market study](#), July 2020.

³⁹ [SMS Proposed Decision](#), paragraph 5.186.

⁴⁰ [SMS Proposed Decision](#), paragraph 5.186-5.187.

⁴¹ U.S. and Plaintiff States v. Google LLC, [Revised Proposed Final Judgement](#), 7 March 2025, page 7.

⁴² U.S. and Plaintiff States v. Google LLC, [Revised Proposed Final Judgement](#), 7 March 2025, page 15.

⁴³ U.S. and Plaintiff States v. Google LLC, [Revised Proposed Final Judgement](#), 7 March 2025, page 23.

government's strategic steer. We will update the Roadmap to reflect our approach in these areas in early 2026.

4. Next steps

- 4.1 As a next step, we will assess in detail the interventions we have set out as key priorities within this document.
- 4.2 Should stakeholders have views on the relative order in which we have prioritised interventions, they can be provided via email at searchsms@cma.gov.uk. Any such views will be considered alongside ongoing engagement with stakeholders, ahead of updating the Roadmap in early 2026.
- 4.3 We will also invite stakeholder views as part of our consultations on the detail of proposed measures, should we decide to designate Google with SMS. For Category 1 measures, these consultations are expected to launch in autumn 2025, shortly after any decision to designate Google with SMS. If we propose to make changes to the prioritisation of any of the Category 1 areas we currently propose to develop, we will clarify these changes when we launch the initial CR consultations.
- 4.4 We plan to issue an updated Roadmap in early 2026, reflecting relevant international developments and any comments received from stakeholders. In line with our 4Ps commitment to predictability, we will seek to provide any further clarity we can on our expected areas of work throughout the designation period. To this end, we intend to revisit the Roadmap at the start of the second half of the designation period, and may set out any different measures if we think they are necessary, based on our analysis at that time.