

Airlines UK response to the CMA consultation on its proposed decision report: SMS investigation into Google's general search and search advertising services

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Airlines UK is the association for UK airlines, with members including 2Excel, Ascend Airways, AirTanker, British Airways, DHL, Eastern Airways, easyJet, European Cargo, FedEx, Jet2.com, Loganair, Norse Atlantic, One Air, RVL Aviation, Ryanair, TUI Airways, Titan Airways, UPS, and Virgin Atlantic.

Airlines UK appreciates the opportunity to respond to the CMA's consultation on its proposed decision report: SMS investigation into Google's general search and search advertising services.

UK airlines support the objectives of the DMCCA in regulating digital gatekeepers to promote more effective competition and enhance consumer protection. Airlines are grateful for the opportunity to have engaged with the CMA throughout its SMS investigation into Google's general search services, in the interests of delivering a balanced, evidence-based approach to the DMCCA framework.

Google Flight Search

The latest UK Aviation Consumer Survey¹ from the UK Civil Aviation Authority's - looking at UK consumers' behaviour and attitudes towards commercial aviation and helping inform the way it regulates – showed that satisfaction levels with two key indicators: 'the process of booking a flight' and 'deciding which flight to book', were overwhelmingly positive (89% and 85% net satisfied respectively, higher than the overall travel experience and the most positive aspects of the travel experience overall). This emphasises why maintaining a high standard within flight search functionality is essential, to help ensure consumers can make confident, well-informed choices and benefit from the full range of flight options available.

Airlines are, however, concerned about the potential impact of changes on the display of Google Flights in the Search Engine Results Page (SERP). Google Flights is an example of a Metasearch Engine (MSE) that competes directly with other MSEs such as Skyscanner and KAYAK, all of which serve as comparison tools rather than vendors. Google Flights aggregates flight information from a wide range of sources—including both airlines and online travel agencies (OTAs)—and presents a real-time view of prices and availability. Users are then redirected to the relevant provider's website (either an airline or an OTA) to complete their booking.

This model is distinct from that of OTAs, which function as vendors and unlike MSEs, offer both booking capabilities and additional travel services. When consumers search for flights on an OTA, they are only presented with prices available through that OTA rather than the full range of fares in the market. OTAs do not, consequently, provide the same breadth of market coverage as MSEs.

¹ <https://www.caa.co.uk/publication/download/24129>

Google Flight Search (GFS) plays an important role in the market. The nature of air travel - considering specific routes, dates, times, and prices – makes accurate, unbiased and high-quality search functionality vital. Refined search functionality - such as filtering by date flexibility, price, airline, or connection type - improves the user experience and empowers passengers to make informed decisions about where and how to book, whether via an online travel agency (OTA) or directly with an airline.

However, we have seen a negative impact on the user experience resulting from changes to Google Search implemented in the EU resulting from the EU's [Digital Markets Act \(DMA\)](#). This has negatively impacted flight searches, resulting in a more difficult experience for consumers and less accurate or relevant search outcomes. This includes discrepancies between pricing information displayed on the search and what is displayed on the website which can lead to confusion.

Balancing innovation and fairness

Airlines recognise that the DMCCA diverges from the DMA in important ways, particularly in its more flexible approach to self-preferencing. The DMA contains a blanket prohibition on self-preferencing (specifically in ranking, indexing, and crawling), whereas the DMCCA empowers the CMA to tailor conduct requirements and pro-competition interventions for each SMS firm, rather than applying a standard set of rules. Under the DMCCA framework, preferential treatment can be justified if the conduct:

- provides substantial benefits to users
- is proportionate and essential to achieving those benefits, and
- does not significantly reduce or eliminate effective competition

Summary

We are concerned about the impact on user experience of changes along the DMA model to Google Flights display in SERP. So long as it meets those tests above we request that the CMA preserves the current functionality of Google Flights using its discretion under the DMCCA - particularly to consider countervailing benefits - in line with the DMCCA's objectives of promoting fair competition and consumer welfare.

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For more information contact [REDACTED]