

## **[REMOVED] consultation response**

### **Re: CMA proposed SMS decision Google general search services**

**Date:** July 2025

#### **Introduction**

**[REMOVED]** welcomes the opportunity to respond to the Competition and Markets Authority's (CMA) proposed Strategic Market Status (SMS) decision regarding Google's general search services and the roadmap published alongside. We commend the CMA's engagement with stakeholders throughout this process and appreciate the seriousness with which it is approaching the regulation of powerful digital platforms (including through its new digital markets competition regime).

This response reflects input from **[REMOVED]** members following the roundtable session with the CMA and builds upon our previous submissions. In relation to the SMS investigation into Google's search services in particular, we urge the CMA to pursue a regime that is clear, enforceable, and ambitious in scope, and to prioritise interventions that address our members' longstanding concerns.

#### **Proposed SMS designation, scope**

**[REMOVED]** members operate **[REMOVED]** services that directly compete with Google in specialised verticals such as **[REMOVED]**. Unlike general search services, these specialised platforms provide real-time, bookable offers and structured content sourced from commercial partners via live data feeds. Our members have invested heavily in this infrastructure to ensure consumers can access accurate, dynamic pricing and availability. However, Google's conduct, particularly the preferential integration of its own vertical services into general search results, has systematically distorted competition. By leveraging its dominance in general search to promote its own specialised services, Google undermines competitors' visibility, reduces traffic to rival sites, and ultimately limits consumer access to choice, innovation, and value.

We strongly support the CMA's provisional finding that Google holds Strategic Market Status in both general search and search advertising. The proposed decision presents compelling evidence that these services exhibit substantial and entrenched market power in the UK, and occupy a position of strategic significance in the digital activity. We agree that services such as Google Search, Ads, AI Overviews, AI Mode, and the broader SERP environment fall appropriately within scope of the CMA's decision.

However, **[REMOVED]** are concerned about the implications of the proposed update to the definition of general search, which may allow Google to blur the distinction between general and specialised search to its own benefit. In contrast to general search services, specialised search providers do not crawl the web but instead present a narrow set of results sourced from **[REMOVED]**. These feeds enable members to provide **[REMOVED]**, a key feature of specialised search that general search services do not replicate. We are concerned that the proposed inclusion of the phrase "and can draw on other sources" in the definition of general search risks blurring the line between general and specialised search. This distinction is vital, particularly in ensuring that any future conduct requirements aimed at preventing Google from unfairly favouring its own services are enforceable. Just because Google has chosen to incorporate its own specialised search units into its SERP (wherefore they rightly fall within scope of the CMA's proposed

decision and enforcement) this does not alter their fundamentally different nature. The **[REMOVED]** or **[REMOVED]** unit are not mere “search features” of Google Search, but separate services that Google is unfairly favouring on the Search Engine Results Page (SERP). Clarifying this distinction is important to ensure that the CMA can adequately diagnose and address the way in which Google uses its power in general search to preference its own specialised search services over competitors’, foreclosing consumer choice in the process. In particular, clarity on this point will make it harder for Google to try and circumvent any conduct requirements regarding the fair treatment of specialised search services by introducing new direct supplier units fed by live data feeds, which still effectively operate as a Google specialised search service. This has been a focus of debate under the DMA, and it would be beneficial for the CMA to pre-empt it in the UK. The scope and language of the final SMS decision should be sufficiently robust to prevent Google’s strategic integration of specialised search features from becoming a workaround to evade conduct requirements.