

SearchSMS: Post Proposed Decision Businesses Roundtable

10 July 2025

Introduction

As part of our Strategic Market Status (SMS) investigation into Google's general search services, we held a series of roundtables and bilateral meetings with affected industry stakeholders to seek feedback on the Proposed SMS Designation Decision and the Roadmap of potential interventions.

The event was chaired by the CMA Director leading the SMS investigation and attended by CMA staff including the Project Director, Digital Markets and the case team. This note summarises the views expressed by 16 businesses and 3 trade associations who attended the roundtable. We will consider these as part of the body of evidence we gather during the SMS investigation.

Update on the Investigation

The CMA shared an update on the investigation, the timeline leading up to the statutory deadline for issuing a Final SMS decision notice on 13 October 2025, and summarised the reasoning for its proposed decision to designate Google as having SMS.

Views on the scope and definition of the digital activity

The CMA outlined the scope of the digital activity of 'general search services' as set out in the proposed decision and articulated what products and features would fall within scope, including AI Overviews and AI Mode. It highlighted that Google's standalone specialised search services such as Google Flights would fall outside the scope of the digital activity, but where these specialised results were included in the Google's main Search Engine Results Page they would be in scope. The CMA noted that the legislation enables it, in principle, to put in place interventions on activities that go beyond than the scope of the digital activity - for example to address concerns about Google leveraging its position in general search services into related activities. The CMA then asked for views on its proposed description of the digital activity.

One participant raised concerns about how the CMA's revised description of the digital activity to include 'and can draw on other sources' (in addition to searching the world wide web) risked blurring the distinction between general and specialised search services. They noted that this point was relevant to discussions around Google's compliance with Article 6(5) of the EU's Digital Markets Act (DMA) and raised the potential impact of this distinction on any potential conduct requirements relating to fair ranking and fair treatment of specialised search providers. The CMA noted that the legal frameworks of the DMA and the Digital Markets Competition Regime were different, and that under the UK regime a 'self-preferencing' intervention could in principle capture conduct 'within' the boundary of the digital activity – should we be minded to pursue such an intervention.

Another participant echoed this concern and asked the CMA to be mindful of the risk of Google 'gaming' the boundary between one service and another. It stated that although it was comfortable with the definition in the PD, it believed the boundary between specialised search and general search services could be made clearer by focusing on the differences from a consumer perspective.

A participant highlighted that the EU's DMA does not distinguish between paid and organic listings in terms of its scope of application of self-preferencing rules, and asked what the CMA's approach would be. The CMA stated that this was a key design consideration which it was considering and that they would welcome views from industry participants about how best to scope the fair ranking intervention.

The CMA was asked if it could provide more information on why Gemini AI assistant was excluded from the scope of the digital activity and how this could impact the ability to set CRs. The CMA explained it had to consider whether Gemini AI assistant was captured within the definition of the relevant digital activity (general search services). It summarised the reasoning set out in its Proposed Decision.

Prioritisation of Potential Interventions

The CMA provided a brief summary of the [Roadmap](#) setting out its priorities for potential interventions should the CMA designate Google as having SMS. The CMA informed participants that it intends to publish an updated version of the roadmap in early 2026.

One business expressed its disappointment that a potential intervention on the fair treatment of Specialised Search Providers (SSPs) was in Category 2 and asked if the CMA was intending to address Google's treatment of its own products within the search engine results page (SERP) under the Fair Ranking Principles in Category 1. The business also said it was disappointed to see restrictions on Google sharing data within its own services not placed in Category 1, as it argued the CMA should address

concerns that Google is able to use advertising data collected from its rivals in the context of Search to improve its own competing services.

The CMA explained it was intending to examine the treatment of Google's products within the SERP as part of a potential Category 1 intervention regarding fair ranking principles. Additionally, it stated that these comments underpinned the value of industry participants engaging with the consultation and the case team during this next stage of intervention development.

One participant noted that some of its concerns around self-preferencing could potentially be addressed via a set of Fair Ranking Principles, but raised concerns about the ability to design and implement an effective intervention and urged the CMA to introduce Category 2 interventions as soon as possible, should Google be designated as holding SMS.

Another participant stated that, from its experience of the DMA process, it was important to define which services were in direct competition with Google, and that it was indispensable to draw a clear distinction between meta search services and online travel agents, which are different business models that should not be treated together. It added that it wanted the CMA to maintain high standards of search in relevant verticals and that certain solutions considered under the DMA had proven not to be viable.

A participant stated that Google provided a good service in sending direct traffic to suppliers and that the DMA measures had led to up to a 30% reduction in direct traffic, which has instead been artificially directed to intermediaries, increasing the cost to the direct supplier and raising free-riding concerns.

The CMA recognised contributions on these points, and noted that, although the DMA's experience was instructive, the UK legal framework is different and its intention was to ensure any interventions led to positive outcomes for UK consumers.

Views on Potential Fair Ranking Principles

The CMA outlined its proposed intervention to introduce a set of fair ranking principles for how Google ranks and presents search results. A participant asked if the requirements would apply across both organic and paid listings. The CMA explained that its starting point was to focus on the ranking of organic results, and the way in which organic listings are ranked against other advertising content, rather than necessarily focussing on the advertiser auction mechanism, but that it was open to feedback on this point.

The same participant stated the information Google provided was not sufficient to understand a site's ranking, and enforcement would be needed to ensure any

intervention was effective. It added that it would be useful to extend a transparency intervention to cover paid listings, as they claimed that the SERP 'real estate' used by paid search is increasing, and there was a shift towards paid traffic. They argued that transparency would aid assessing the fairness of ranking results.

The CMA asked participants about transparency over the ranking and volume of ads present in search results. A business responded that in its view, due to the increased presence of paid listings on the SERP over time, clarity on the ranking mechanisms for these listings was becoming more important and may need to be included as part of fair ranking principles in order for them to be effective.

A participant said that the line between organic and paid listings was blurring in the way listings functioned and what signals were considered, and that ranking across organic and paid listing should be assessed holistically. They argued that the increasing complexity of paid advertising could be viewed as another way for Google to operate an SSP within the SERP. Further they claimed that it was important to take into account the potential positive externalities if consumers conducted their searches through third-party SSPs rather than Google.

Another participant followed on by saying that focusing on the consumer experience can be challenging, as the CMA would need to assess what appropriate success measurements would look like, taking account of the user experience, within and outside of Google Search, which they viewed as likely quite subjective. The participant highlighted the goal within the DMA was not just improve competition between Google and its competitors, but to encourage competition within related markets, many of which were dominated by incumbents, and the CMA should assess competition and consumer benefits across the whole ecosystem.

Another participant responded to these comments and suggested that, whilst they understood the concerns around self-preferencing, the user experience and relevance of results with general search needs to be balanced within any intervention.

The CMA reiterated that the DMCC Act in the UK was a different legal framework from the DMA in Europe, and that the CMA was committed to considering the merits of intervention and ensuring that any potential intervention was proportionate and beneficial to end users.

Transparency

The CMA outlined its possible interventions for enhancing transparency. One business indicated that increased transparency could be beneficial and noted that limited information about ranking changes has been a major concern. The business added that transparency could potentially discourage Google from prioritising its own services. However, it also stated that the effectiveness of such measures would

depend on the extent of transparency provided, such as understanding both the signals used in Google's algorithms and their respective weights. The business acknowledged the need to balance protecting Google's proprietary algorithms with enabling businesses to review its practices.

The CMA sought input on what information would be necessary to achieve such a balance. The same business suggested that the CMA examine the testing data used by Google before implementing changes, as well as the thresholds applied. It recognised potential challenges but raised concerns about relying solely on general concepts.

The CMA clarified that it aimed to assess the benefits of policies like advance notification of core updates and to determine what level of notice would be appropriate. The CMA emphasised the importance of ensuring any intervention is suitably focused and the need to understand its potential impact.

A participant observed that issues related to transparency have affected businesses for over two decades and questioned why weighting and criteria could not be disclosed publicly. The participant acknowledged that Google's proprietary algorithms derive value from how outputs are generated based on weightings. According to the participant, reliance on Google remains a key issue for businesses and suggested that the CMA should prioritise fostering competition in general search. Additionally, questions were raised about why Google does not provide anticipated site impacts and whether current guidance is sufficient.

Another participant noted that whilst transparency is already limited in organic and paid rankings, Google currently provides no meaningful information on how traffic is referred through features like AI Overviews. They expressed caution regarding the overall impact and observed that due to the rapidly increasing proportion of search results in which they appear, concerns regarding AI Overviews have grown compared to six months prior, particularly regarding a lack of clarity on content selection, use, and display. The participant requested that any CMA interventions aimed at publishers be extended to other businesses if implemented.

A further comment was made suggesting a requirement for transparency around Google's use of data collected from competitors, including which Google services and staff can access such data.

Views on Complaints Process

The CMA sought input on which complaints to prioritise in any intervention. One business claimed it had lost a significant amount of income after its site was blacklisted by Google following a cloning incident and reported difficulty resolving the issue due to a lack of direct human support. Another participant emphasised that complaints

processes need transparency to help businesses understand and address problems. A third business added that effective oversight and external accountability are essential for any complaints procedure to work.