

## **SearchSMS: Post Proposed Decision Publishers Roundtable**

7 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 case team. This note summarises the views expressed by 17 publishers and 5 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 proposed description 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.

Several participants asked questions about the reasoning for certain Google products (including Gemini AI assistant and YouTube) being outside of the proposed scope of the digital activity, given their potential importance to publishers. The CMA noted that in principle it would have the ability to put in place CRs to address concerns if Google was leveraging its position in search to influence its position outside of the digital activity. However, it also welcomed any responses to its consultation on the proposed

decision to the extent that publishers had views on the proposed scope of the digital activity.

## **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 confirmed that it intends to publish an updated version of the roadmap in early 2026.

A trade association representative asked if the potential intervention to restrict Google's ability to share data described in the roadmap would be limited to data sharing between Google's own services, or if it would also impact Google's ability to share data with third parties. The CMA explained that the specific potential intervention being referred to in the roadmap related to data sharing between Google's services, but this would not be a priority for the initial period of the designation (Category 3).

A participant stated that there was likely to be a connection between the potential Fair Ranking Principles intervention and any potential intervention related to fair and reasonable payment for publishers, given Google's control and ability to influence the way in which users access, and click through, to publisher and other web content. Another participant asked the CMA to explain why the implementation of interventions had been delayed, given it had initially suggested it would consult on initial CRs alongside the SMS investigation and aim to implement initial CRs at the point of reaching a final SMS decision. A further participant highlighted that the introduction of AI Overviews was already having a significant impact on traffic and on business, and the prospect of AI Mode being introduced was also of concern to publishers.

A participant raised a concern that by the time a potential CR was implemented there could be limited traffic coming to publishers from Google. They stated that since the beginning of April they believed there had been a large increase in the number of searches displaying an AI Overview, leading to 70% drop in its click through rate on desktop, and a 52% drop on mobile according to its internal data.

## **Views on transparency, attribution, and choice**

### ***Transparency***

The CMA explained that a potential intervention requiring Google to provide greater transparency to publishers could cover two elements: firstly, greater transparency of data on user interactions with search content, for example providing better information on traffic from AI Overviews and AI Mode in Google's Search Console, which is currently aggregated with general search traffic; and secondly, greater clarity over how

publisher content is used in Google's generative AI features and services (for example, AI Overviews). The CMA asked for views on this topic.

A participant stated that the use of the term 'referred traffic' can be misleading, and what was most valuable for publishers to understand was how content was served, what the user intent was behind a search result, how often content is used in AI Overviews and how a user engaged with Google. Another stated what would be most useful to understand is how many times has content appeared directly in an AI Overview, how has it been used to train the underlying AI model and whether and how it is used for the purpose of RAG, as this would help publishers calculate the value of their content to Google. They also noted it may also be helpful to understand how many impressions content receives from Search by exact search query, and what rank publisher content is within AI Overviews.

One participant stated that click-through rate is key to revenue, and it would be valuable to know how many times content appeared in an AI Overview without generating a click. Another added it would also be useful to have greater clarity over what queries AI Overviews are shown on. A representative of a trade association agreed that transparency is key to understanding the value of publisher content to Google, and more granular transparency would be useful for this purpose..

Two participants stated concerns over the roll out of AI Mode in the UK and asked if the CMA would consider asking Google to delay its implementation in the UK. The CMA stated that it anticipated that potential conduct requirements would apply to AI Mode as they would to AI Overviews where this was proportionate. The CMA did not want to restrict Google's ability to continue to innovate in Search.

### ***Attribution***

The CMA asked participants to suggest what 'good' attribution of their content would look like in AI Overviews. A participant suggested when discussing AI Overviews, alongside attribution there should also be a focus on the extent content is used verbatim and how much content could be used within an AI Overview, particularly from a zero-click perspective. They gave the example of 'How to' guides which they argued were unlikely to receive click throughs if all the relevant content was included in the AI Overview itself, even if attribution was present.

One participant said that they saw attribution and transparency interventions as analogous to licensing terms, which could be part of a wider contract negotiation with Google.

A participant told the CMA that they thought attribution was of limited in value to publishers, as often the user intent has already been met by Google and saw attribution as inherently linked to establishing fair and reasonable payment for content.

The CMA asked if publishers had any concerns about their content being listed next to out-of-date or inaccurate information. Additionally, it asked if clearer attribution would be of value even if it does not solve all issues.

A publisher stated this would likely vary from enterprise to enterprise. The same publisher stated that a robust intervention regarding choice and transparency would enable the market to address attribution questions, and hoped the CMA's potential Category 1 interventions would put publishers in a better place to negotiate with Google.

A participant asked the CMA if it was considering issues faced by publishers when AI content leads to legal issues such as defamation, and the commercial costs and reputational damage associated with this. They asked if the CMA had considered who should be liable, and how publishers are able to seek redress against large platforms such as Google.

### **Choice**

The CMA asked the participants if more meaningful choice over the use of content would help their business. We explained that Google already offered users controls in this area such as the 'nosnippets' HTML tag, however there appeared to be low uptake of this feature and wanted to understand why, and if the option to be excluded from AI Overviews without impacting appearance in Search snippets would be useful.

A participant stated Google was able to use its position to design defaults that allowed Google to use publisher content and to design to opt-outs with limited room for publishers to use them. They asked the CMA if an opt-in approach is needed for a choice to be meaningful. Another shared a view that it was hard to separate wanting to be visible in search results and in AI Overviews given the prominence of AI Overviews on the SERP.

Another stated that publishers were in a difficult position and that opt outs would become less relevant if publishers were paid for the use of content. They argued that currently some publishers will always opt in, making it challenging for others to opt out. The same participant said that there are many publishers who did not have the resource to understand how their content was being used by Google and engage with any controls.

### **Views on Fair ranking principles**

The CMA explained it is exploring a set of Fair Ranking Principles with the aim of ensuring that Google rank and present search results in a fair and non-discriminatory manner, reflecting Google's significant role as a gateway for businesses to attract users, including business which compete with Google's own services.

A participant stated that Google promoted its own services over those who provide value such as publishers. They stated it could be a positive step to consider a positive obligation around trust, and promoting sites which are trusted sources, such as those who are members of the NUJ. Another raised a concern regarding the discovery of publishers' video, as YouTube is present on 85% of SERPs given a video context.

## **Views on Complaints Process**

The roundtable finished before there was time to discuss some of the wider issues relating to fair ranking principles. The CMA encouraged participants to follow up with views including on transparency and advance notice of policy changes, and on complaints processes.

One participant explained that, in its experience, Google's complaints processes regarding its Site Reputation Policy were automated, there was a lack of certainty around timelines and outcomes, and the impact on revenues could be significant.