

## Individual 1

1. Do you agree with the CMA's proposed approach to the design of the levy rules?

Answer: Partially agree

Explanation:

While I support the principle of a fair and proportionate funding model for regulating powerful digital firms, the proposed levy rules must better reflect public interest and national priorities. The UK public and its institutions have a right to expect that dominant digital platforms operating here contribute appropriately to regulatory oversight.

However, any levy mechanism should ensure British users, consumers, and smaller UK-based businesses are not unduly burdened or priced out by dominant foreign platforms passing costs down the chain.

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2. Do you have any comments on the CMA's proposed approach to defining SMS group revenues for levy calculation?

Answer: Yes

Explanation:

It is critical that SMS group revenues include all relevant UK-originating revenues and not just those captured by accounting technicalities. Many SMS-designated platforms, such as large US tech firms, operate via complex corporate structures to avoid tax or regulation. The CMA should ensure no revenue "leakage" via subsidiaries or shell entities.

Revenues from practices that rely on gender-identity profiling, exploit same-sex service categorisation (e.g. dating apps like Grindr or HER), or mislead consumers on the basis of sex-based rights should be explicitly reviewed and categorised in line with the UK Supreme Court's 2024 judgment on the legal definition of sex. This ensures the levy does not subsidise policy non-compliance.

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3. Do you have any comments on the CMA's proposals regarding how levy rates will be determined and applied to SMS firms?

Answer: Yes

Explanation:

Levy rates must take account of the actual cost burden of compliance monitoring, particularly where the SMS firm has a history of regulatory evasion, harmful algorithmic practices, or non-compliance with UK values or rulings (e.g. on equality, consumer protection, or advertising).

SMS firms offering gender-misleading services, undermining UK constitutional norms, or eroding protections for same-sex attracted individuals or biological sex rights, should be held to a higher accountability and levy threshold. The levy should fund enhanced monitoring of such areas.

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4. Do you have any comments on the CMA's proposed approach to administrative and payment processes under the levy rules?

Answer: Yes

Explanation:

While a streamlined and transparent system is welcome, administrative processes must also be robust to audit, ensuring foreign tech platforms cannot obfuscate or delay payment. The CMA should consider linking the levy to compliance with wider public policy expectations including adherence to UK equality law, particularly in digital spaces where these firms influence public discourse and private lives.

Mechanisms should exist to withhold UK market privileges or features from non-compliant firms until payment or compliance is ensured.

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5. Do you have any other comments on the proposals set out in this consultation, including the impact of the levy on SMS firms or wider stakeholders (including consumers)?

Answer: Yes

Explanation:

The levy represents a rare opportunity to reassert UK sovereignty in regulating global tech platforms. It must therefore also support wider national strategic goals, including:

- Prioritising UK-based workers and services over offshoring,
- Discouraging platforms that favour imported ideological norms over UK legal standards (e.g. misrepresenting gender identity as biological sex),
- Protecting LGB rights and sex-based protections in online service provision,
- Ensuring transparency in AI and profiling tools that may reinforce harmful biases or infringe upon civil liberties.

The levy revenue should help fund not just operational enforcement, but also public legal education, compliance audits, and UK-based alternatives to monopoly digital services—bolstering economic independence, cultural resilience, and social cohesion.

Kind Regards,