

Consultation: Fair Ranking Conduct Requirement

Google's general search services

28 January 2026

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The Competition and Markets Authority has excluded from this published version of the consultation document information which the CMA considers should be excluded having regard to the three considerations set out in section 244 of the Enterprise Act 2002 (specified information: considerations relevant to disclosure).

The omissions are indicated by [☒]. Some numbers have been replaced by a range. These are shown in square brackets. Non-sensitive wording is also indicated in square brackets.

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1. Introduction

- 1.1 Google's general search services are an important means by which other firms, across a wide variety of sectors, access customers, facilitate transactions, and therefore carry out their business. They are a key gateway through which businesses and content creators can reach consumers, and people access and navigate the world wide web. As such, Google Search is important for virtually all content creators – we use the term **publisher** broadly in this consultation document to refer to all parties that make content available on the world wide web.
- 1.2 We therefore consider it important that publishers are treated fairly where their content is used in general search, with confidence in their interactions with Google and its ranking practices, enabling consumers to access a wide range of high-quality, accurate content.
- 1.3 This consultation document sets out our proposals for a Fair Ranking Conduct Requirement (**Fair Ranking CR**). It includes the following:
 - (a) [Section 2](#): Aim of our Fair Ranking CR
 - (b) [Section 3](#): Our proposed Fair Ranking CR and Interpretative Notes
 - (c) [Section 4](#): Effectiveness of our proposed Fair Ranking CR
 - (d) [Section 5](#): Provisional proportionality assessment for the Fair Ranking CR
 - (e) [Section 6](#): Questions for consultation
- 1.4 For more information about the digital markets competition regime, Google's designation with SMS in general search services, and the framework for the introduction of CRs, see the '[Introduction to the consultation](#)' document published separately.

The issues we are seeking to address: Google's ranking of organic search results

- 1.5 Google can alter its ranking and presentation of organic search results through a range of means, including by making changes to its ranking

algorithm systems;¹ changes to its search policies;² and by the design and presentation of search features, most recently introducing AI Overviews and AI Mode.³ Google submitted that all changes are subject to a rigorous evaluation process.⁴ Recently, Google's ranking practices were codified into an internal Fair Wholepage Composition Policy.⁵

- 1.6 We have identified four broad categories of concerns held by stakeholders in relation to Google's ranking of search results:
 - (a) Google may uprank or downrank content for unfair reasons.
 - (b) Google does not provide sufficient notice or information when it implements a change to its ranking algorithm.
 - (c) Google may not sufficiently take into account the impact of its ranking or presentation policies on markets.
 - (d) Google does not provide effective means for businesses to raise concerns and ensure these are effectively dealt with.
- 1.7 The following sections summarise these concerns and our evaluation of each in turn, explaining why we are seeking to address them in the Fair Ranking CR.
- 1.8 As part of our policy development, we have worked with Ofcom to ensure coherence with the regulatory regimes they oversee, including the Online Safety regime. We will continue working with Ofcom and other regulators as appropriate as we consider whether, and if so how, to develop and implement the Fair Ranking CR.

¹ Google, Google Search Central, '[A guide to Google Search ranking systems](#)', accessed by the CMA on 1 December 2025. Google's ranking algorithms are supported by a wide range of ranking signals including keyword relevance, content freshness, site usability, and user engagement metrics.

² Policies affecting Google's ranking and presentation of search results includes search quality policies such as the [Site Reputational Abuse Policy](#) and [SafeSearch](#) which govern the exclusion, display or downranking of certain content types. It also includes Google's [Honest Results Policy](#) which states that it does 'not provide special treatment based on having some type of relationship with Google'.

³ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, paragraph 4.50.

⁴ Google's consolidated response to the CMA's RFI. For example, in 2023 Google ran over 800,000 tests with over 15,000 live traffic experiments and over 120,000 side-by side experiments, resulting in over 4,500 changes to Google Search. See: Google Search, '[Search engine testing and evaluation](#)', accessed by the CMA on 13 January 2026.

⁵ [§§].

Concerns that Google may uprank or downrank content for unfair reasons

1.9 Google has a long-standing public Honest Results Policy, which states that it 'ensures that you can trust Google Search to deliver the most relevant and reliable information'.⁶ We consider that the high-level nature of that policy, and the way that ranking is determined through a range of systems, policies and design decisions (see paragraph 1.5) which cannot be independently verified by third parties, has resulted in publishers facing uncertainty about whether Google is taking into account unfair factors when ranking. In particular:

- (a) We do not consider that it is sufficiently clear how Google's ranking systems and policies give effect to its Honest Results Policy particularly in its search generative AI features (eg AI Overviews and AI Mode).⁷
- (b) Having heard from a wide range of publishers during our public consultations and broader evidence gathering, we consider that the inability for third parties to verify Google's application of its Honest Results Policy has led to a wide-ranging perception that it might be upranking or downranking certain content based on unfair factors, including concerns held by stakeholders that:
 - (i) **Google may uprank content based on commercial relationships.** Publishers submitted that Google may have boosted Reddit content's overall prominence following securing of a data partnership in February 2024, which would be inconsistent with Google's Honest Results Policy;⁸
 - (ii) **Google may downrank content as a means of retaliatory action.** Some publishers submitted concerns about how their interactions with Google, including commercial negotiations, may impact their ranking performance;⁹ and

⁶ Google, '[Honest Results Policy](#)', accessed by the CMA on 13 January 2026.

⁷ Google submitted that the [REDACTED]. Google's submission to the CMA.

⁸ We heard the concern from a few publishers. [REDACTED] response to the CMA's RFI; [REDACTED] response to the CMA's RFI; [REDACTED] response to the CMA's RFI. Google launched a core update in November 2023 to prioritise user-generated content [[link](#)], followed by a further update in August 2024 [[link](#)]. Following that update Reddit goes from being the 78th most visible site in the US to the third most visible web site, see: RBH, '[What's Happening with Google and Reddit](#)', accessed by the CMA on 19 January 2026.

⁹ A Publisher [REDACTED] noted they approached commercial negotiations with Google with a degree of caution given the lack of transparency around the factors that might affect its search performance on Google. [REDACTED] response to the CMA's RFI. [REDACTED] response to the CMA's RFI, [REDACTED] response to the CMA's RFI, [REDACTED] response to invitation to comment.

(iii) Google **may provide more favourable treatment of its own services compared to rivals in its ranking.** Some publishers submitted that Google may be providing more favourable ranking of YouTube content versus other video content providers,¹⁰ and its introduction and design of search features like the Flights module may result in undue prominence, with a potential negative impact on the visibility of specialist search providers.¹¹

1.10 The perception by publishers of potential unfairness inherent in Google's results has resulted in at least some publishers altering their behaviour in commercial bargaining with Google and deterring investments¹² – which may undermine good consumer outcomes. For example:

- (a) A publisher submitted that 'competing video platforms or content creators have little chance of gaining visibility, discouraging investment and innovation in the open web'.¹³
- (b) A specialised search provider noted that Google's conduct has been a key driver behind its drive to diversify into other product verticals. It submitted however that, 'at every stage we still find ourselves dependent on Google in a way that either already undermines or risks undermining our strategy. In [REDACTED], for example, not only do we find ourselves facing the same issue of Google self-preferencing in its [REDACTED] product on the SERP, but we are reliant on Google products to deliver our [REDACTED] product that could, in theory, be weaponised by Google at any time'.¹⁴

1.11 We have not seen direct evidence that Google's individual ranking decisions are unfair.¹⁵ However, taken in the round: the role of Google's general search as a critically important digital tool for people and businesses; the lack of trust and perception of unfairness in Google's ranking; the lack of sufficient transparency about how Google implements and operationalises its ranking in practice; and the direct impact this lack of trust has had on publishers, including deterring investment, leads us to consider that there is merit in introducing a formal requirement, with which Google must demonstrate compliance, for Google to treat publishers fairly in its ranking.

¹⁰ [REDACTED] response to the CMA's RFI; [REDACTED] response to the CMA's RFI.

¹¹ Skyscanner's response to the CMA's RFI; [REDACTED] response to the CMA's RFI.

¹² [REDACTED] response to the CMA's RFI; [REDACTED] submission to the CMA, [REDACTED] response to the CMA's follow-up RFI.

¹³ [REDACTED] response to the CMA's RFI.

¹⁴ [REDACTED] submission to the CMA.

¹⁵ We have at this stage not carried out a detailed assessment (eg algorithmic audit) of Google's ranking systems to form a view about the fairness (or otherwise) of its ranking.

1.12 We would expect that effective demonstration of compliance with this measure – even if not resulting in material changes to how Google’s systems and policies operate – would be likely to result in greater publisher confidence that they will be treated fairly, and consequently greater confidence to invest in their products and services to deliver better consumer outcomes. More detail on this is set out in [section 5](#).

Concerns that Google does not provide sufficient notice or information when it implements a change to its ranking algorithm

1.13 A range of businesses raised concerns about the significant time and resources required to understand and respond to changes in Google’s ranking algorithm, and submitted that unexpected changes give rise to substantial costs.¹⁶ Publishers depend heavily on swift understanding and reaction to these changes by Google in order to optimise their ranking and therefore protect and promote their businesses. For example:

- (a) A specialised search provider submitted that a complex ranking algorithm update may absorb 500-1000 person-hours or more, and that this quickly becomes a six-figure operational burden.¹⁷
- (b) A publisher also submitted that it has had to invest in third-party tools to understand how Google ranks. This equates to approximately £100,000 annually. This publisher also hires a significant number of employees to react to algorithmic changes and subsequent downranking.¹⁸

1.14 Additionally, a number of publishers submitted that the potential volatility (or lack of predictability) of changes to Google’s search rankings impacted them in the following ways: their staffing and operations,¹⁹ and difficulties in accurately forecasting financial performance.²⁰ Two publishers submitted that these impacts were exacerbated by Google not offering feedback, explanation or guidance on how to mitigate their impact.²¹

1.15 The evidence we have reviewed suggests that businesses may be subject to avoidable costs that arise from the need to understand and rapidly respond to changes made by Google, to ensure they continue to be visible in search

¹⁶ [REDACTED] response to the CMA’s RFI; Dunelm’s response to the CMA’s RFI; Skyscanner’s response to the CMA’s RFI; Yelp’s response to the CMA’s RFI; Kelkoo’s response to the CMA’s RFI; [REDACTED] response to the CMA’s RFI.

¹⁷ [REDACTED] response to the CMA’s RFI.

¹⁸ [REDACTED] response to the CMA’s RFI.

¹⁹ [REDACTED] response to the CMA’s RFI.

²⁰ [REDACTED] response to the CMA’s RFI.

²¹ [REDACTED] response to the CMA’s RFI; The Evening Standard’s response to the CMA’s RFI.

results. We consider that if Google provided greater transparency and notice of changes that impact businesses relying on its general search, then these costs could be reduced.²²

Concerns that Google may not sufficiently take into account the impact of its ranking or presentation policies on markets, nor offer an effective complaints procedure for affected publishers

1.16 As set out below, we have identified concerns about the impact of Google's ranking and presentation policies on markets outside of general search, and the ability for publishers to raise complaints to Google where they have been affected by its policies.

Impact of Google's ranking or presentation policies on markets

1.17 Google's ranking and presentation of search results could have material negative consequences for the functioning of markets outside of general search. Representations to us have focussed primarily on two case studies which we set out below:

(a) **Site Reputation Abuse Policy:** As part of its spam policies, Google has a dedicated policy to address situations where one firm hosts its content on a second firm's website to take advantage of the second firm's established ranking signals to rank better than it could in isolation.²³

Following Google's introduction, and subsequent update in November 2024, of Google's Site Reputation Abuse Policy, a few publishers observed significant traffic reduction and corresponding revenue loss.²⁴ One publisher submitted that while the cost of the policy is still being quantified it estimates the impact as upwards of £1 million per annum.²⁵ A coupon provider submitted that the policy had severely impacted its

²² See paragraphs 5.31 to 5.36 where costs to businesses are described in further detail.

²³ Google, '[Site reputation abuse](#)', accessed by the CMA on 7 January 2026. Ranking signals for Google's Search algorithms include Meaning, Relevance, Quality, Usability and Context. Google, '[Ranking results](#)', accessed by the CMA on 7 January 2026.

²⁴ [§§] response to the CMA's RFI; [§§] response to the CMA's RFI.

²⁵ Google, Google Search Central, '[Updating our site reputation abuse policy](#)', 19 November 2024, accessed by the CMA on 13 January 2026; [§§] response to the CMA's RFI.

business, resulting in it losing more than 80% of its UK turnover. Stand-alone coupon sites were unaffected by the policy.²⁶

(b) **SafeSearch Policy:** Google uses multiple systems to protect users from potentially offensive or inappropriate content, including as of 2023 a new default setting that blurs explicit imagery that users may encounter on Search.²⁷

Many [§§] sexual wellness providers submitted that Google applies the SafeSearch policy in a discriminatory way – restricting results from specialist retailers but not results for more general retailers (for example Amazon and Boots) that offer the same or similar products.²⁸ These businesses submitted that as a consequence of Google's changes they have seen substantial reductions in website traffic and sales of up to 20% since October 2021.²⁹ A few of these businesses submitted individually that they had sought to raise concerns with Google via a range of channels, without any meaningful response.³⁰

- 1.18 We recognise that any changes Google makes to its ranking systems and associated policies by their very nature are intended to affect the ranking of one publisher's content relative to others'. Changes Google makes may also be in pursuit of legitimate policy objectives (eg minimising spam or restricting the display of sensitive or explicit content).
- 1.19 However, based on Google's strategic position as an access point for publishers that rely on it to attract users, and the evidence we have seen of Google's existing processes and application of these, we consider that Google may not have sufficient incentive to appropriately consider or mitigate the wider impacts on other markets resulting from its ranking systems and policies (and changes it makes to them).

²⁶ [§§] submission to the CMA. The issue is now subject to a live investigation by the European Commission under Article 6(12) and Article 6(5) of the Digital Markets Act 2022, see: [Commission opens investigation into potential Digital Markets Act breach by Google](#), 13 November 2025.

²⁷ Google, Google Search Central, '[How Google handles explicit content in Search results](#)', accessed by the CMA on 13 January 2026; Google's response to the CMA's RFI.

²⁸ Lovehoney's submission to the CMA; Ann Summers's response to the CMA's RFI; Lovehoney's response to the CMA's RFI; Note of meeting with sexual wellness providers.

²⁹ Lovehoney's submission to the CMA signed by nine other sexual wellness providers.

³⁰ Ann Summers's response to the CMA's RFI; Lovehoney response to the CMA's RFI; Note of meeting with sexual wellness providers.

Google's application of existing complaints procedures for affected publishers

- 1.20 Although Google's weak incentives to fully consider or mitigate the wider impacts on other markets resulting from its ranking systems and policies may, at least in principle, be addressed through an effective complaints process to allow affected publishers to raise concerns with Google, stakeholders have submitted that Google's existing routes for raising concerns are insufficient.
- 1.21 Google offers two primary routes through which businesses can raise concerns about how they are listed in general search. First, publishers can log 'reconsideration requests' in relation to manual actions relating to spam policies via Google Search Console; and, second, Google offers a specific mechanism for complaining about the treatment of content under Google's SafeSearch policy.³¹
- 1.22 Google also monitors updates it makes to its search engine through various means such as [REDACTED]. Based on this monitoring, if issues are identified, including unintended negative ranking impacts, Google assesses whether to make adjustments.³²
- 1.23 We received submissions from a broad range of stakeholders that Google's existing complaints processes are insufficient, leaving businesses without clear resolutions to problems or with difficulty engaging with Google.³³ We also received submissions that such failure to offer sufficiently effective routes for parties to raise concerns gives rise to significant costs for businesses.³⁴ For example, in relation to the two policies we have considered:
 - (a) One publisher submitted that following implementation of the Site Reputation Abuse Policy, Google applied manual penalties to two

³¹ Google, Google Search Central, '[Manual actions report](#)', accessed by the CMA on 28 October 2025; Google's Roadmap Hearing slide deck.

³² Google's submission to the CMA.

³³ AITO's response to the invitation to comment; Checkatrade's response to the invitation to comment; DMG Media's response to the invitation to comment; European Publishers Council's response to the invitation to comment; Impress, the Independent Media Association and the Media Reform Coalition's response to the invitation to comment; Lovehoney's response to the invitation to comment; Network N Media's response to the invitation to comment; News Media Association's response to the invitation to comment; Platform Leaders' response to the invitation to comment; Professional Publishers Association's response to the invitation to comment; Public Interest News Foundation's response to the invitation to comment; BBC, Premier League and Sky's response to the invitation to comment.

³⁴ Lovehoney's response to the CMA's RFI; [REDACTED] response to the CMA's RFI; [REDACTED] response to the CMA's RFI; Ann Summers' response to the CMA's RFI.

sections of its website, for which it submitted six reconsideration requests – all were rejected, with only one request triggering feedback.³⁵

(b) One sexual wellness products supplier submitted that it had spent considerable internal and external resources, unsuccessfully, in urging Google to change its SafeSearch Policy. This supplier estimated that it had spent more than £140,000 in addressing its concern in relation to SafeSearch.³⁶

1.24 Having reviewed the evidence submitted by Google about its existing processes, and third parties' submissions on their experience engaging with Google and impact on their business, we consider that Google's existing processes do not effectively allow publishers to raise and resolve concerns about the way in which Google's ranking systems and policies apply to their content, for the following reasons:

(a) Google's reconsideration and dedicated SafeSearch mechanisms enable publishers to notify Google that they have made changes to their website in an effort to comply, rather than raising concerns about the application of the policy or the potential unintended impact that it may have on publishers.

(b) In respect of the SafeSearch mechanism, we note that Ofcom has provided examples of the kinds of content considered to be, or not to be, primary priority content that is harmful to children and priority content that is harmful to children.³⁷ In our view, Google has not communicated meaningfully with complainants about the concerns they have raised about its application of the SafeSearch Policy, nor made any specific changes to the implementation of the policy which may be able to mitigate the impact on legitimate business concerns while complying with regulatory requirements.

1.25 We consider that requiring Google to introduce or amend existing complaints procedures to ensure more effective opportunities for publishers to raise and resolve concerns with Google would therefore likely result in a reduction in avoidable costs currently borne by publishers.

³⁵ [X] response to the CMA's RFI. Since the publisher's submission of its response in February 2025, it submitted a seventh reconsideration request. This request was successful, and the manual penalty was subsequently lifted from one of the two sections later that month. Correspondence from [X].

³⁶ Lovehoney's response to the CMA's RFI.

³⁷ [Protecting Children from Harms Online: Guidance on Content Harmful to Children](#), 24 April 2025, page 18.

Issues that we are not seeking to address through the Fair Ranking CR

1.26 In addition to the issues considered above, stakeholders raised other concerns, particularly in relation to paid-for (sponsored) content and the need to ensure fair treatment of competitor specialised search services. For the reasons set out below, we do not intend to address these concerns through the Fair Ranking CR.

Google's ranking of paid-for content

1.27 The concerns identified in the above section relate to organic search results and content; however we have heard from many businesses that the intervention should also apply to paid-for content³⁸ because the distinction between organic and paid-for content is becoming increasingly blurred for users, who see one integrated experience,³⁹ and excluding paid-for content could enable Google to circumvent the obligation and engage in self-preferencing conduct.⁴⁰

1.28 A few respondents also submitted that if the intervention did apply to paid-for content, it would need to include different principles, recognising, for example, the role of advertiser bid amount.⁴¹

1.29 Having considered these submissions, we do not consider it necessary to address issues with paid-for content through this intervention, since:

(a) Paid-for content is subject to different ranking systems and policies within Google than those applicable to organic results. In particular, the position of paid-for content is partly dependent on the bid provided to Google by the advertiser, alongside ad relevance and quality metrics.⁴² We do not consider that the ranking systems and policies are sufficiently aligned to justify the application of a single set of requirements for organic and paid-for content.

³⁸ A large proportion of stakeholders at our [business roundtable](#) agreed with this proposition (Note of roundtable with Businesses on 10 July 2025. Additionally, 15 of 25 respondents supported the application of fair ranking principles to both organic and paid for content. [☒] responses to the CMA's RFIs.

³⁹ [☒] response to the CMA's RFI; Skyscanner's response to the CMA's RFI; [☒] response to the CMA's RFI; Checkatrade's response to the CMA's RFI; Ryanair's response to the CMA's RFI; [☒] response to the CMA's RFI.

⁴⁰ [☒] response to the CMA's RFI; [☒] response to the CMA's RFI; [☒] response to the CMA's RFI.

⁴¹ 4 responses to voluntary request for information dated July 2025. [☒]

⁴² Google's consolidated response to the CMA's RFI.

- (b) We have received limited specific examples from businesses of Google's ranking of search advertising being unfair.
- (c) In relation to complaints, we understand that some third parties consider that access to their account manager may operate as an effective vehicle to address concerns.⁴³

1.30 We consider that the Fair Ranking CR can be drafted to address concerns about circumvention without extending the scope to paid-for content.

Google's unique access to, and ability to design, search features

1.31 In the Roadmap, we drew a distinction between a measure intended to ensure fair ranking and an effective complaints procedure (Category 1) and a measure intended to ensure fair treatment of competitor specialised search services (Category 2).⁴⁴

1.32 In addition to the concerns received in relation to Google's treatment of its own services compared to rivals in ranking (see paragraph 1.9(b)(iii) above), we received representations from a broad range of specialised search providers and other businesses on whether our intervention should address various other, related issues associated with Google's ranking and presentation of search features.⁴⁵

1.33 The majority submitted that we should also address the following concerns about how Google designs and presents search features, which they consider restrict their ability to effectively compete:

- (a) That Google restricts access to certain search features to itself alone (eg the Flights Module or Local Search Ads) so that alternative providers of services such as flight comparison cannot provide equivalent results;⁴⁶ and

⁴³ [REDACTED] response to the CMA's RFI; [REDACTED] response to the CMA's RFI.

⁴⁴ [Roadmap of possible measures to improve competition in search](#), paragraphs 2.8 to 3.10 and 3.15 to 3.19.

⁴⁵ Many [REDACTED] specialised search providers across travel, shopping and local services responded to our voluntary request for information: [REDACTED].

⁴⁶ Kelkoo's response to the CMA's RFI; Skyscanner's response to the CMA's RFI; [REDACTED] response to the CMA's RFI; [REDACTED] response to the CMA's RFI; Direct Booker's response to the CMA's RFI; Checkatrade's response to the CMA's RFI; Yelp's response to the CMA's RFI; [REDACTED] response to the CMA's RFI.

(b) That Google's design of search features gives those features undue prominence to users at the top of the SERP, which its rivals cannot replicate.⁴⁷

1.34 We recognise the potential for Google's ability to design and restrict access to specific search features to have a material impact on competition in some markets. However, we continue to consider, as set out in our Roadmap,⁴⁸ that such issues are best addressed through more targeted measures in relation to specific product or service verticals, which may better allow us to take account of:

- (a) The nature of competition and impacts of Google's conduct within each product or service vertical; and
- (b) The most future proof, targeted and proportionate measure to introduce – paying particular attention to users' engagement with information via search generative AI features (eg AI Mode).⁴⁹

1.35 We are considering our next steps on this in light of developments in the European Commission's current investigation into Google's compliance with Article 6(5) of the Digital Markets Act.⁵⁰

⁴⁷ Kelkoo's response to the CMA's RFI; Skyscanner's response to the CMA's RFI; [REDACTED] response to the CMA's RFI; [REDACTED] response to the CMA's RFI; Direct Booker's response to the CMA's RFI; Checkatrade's response to the CMA's RFI; [REDACTED] response to the CMA's RFI.

⁴⁸ [Roadmap of possible measures to improve competition in search](#), 24 June 2025, page 18.

⁴⁹ For example, see reporting on Google's introduction of a Flight Deals tool in AI Mode. TechCrunch, '[Google rolls out its AI 'Flight Deals' tool globally, adds new travel features in Search](#),' 17 November 2025, accessed by the CMA on 18 November 2025.

⁵⁰ European Commission, [Commission opens non-compliance investigations against Alphabet, Apple and Meta under the Digital Markets Act](#), 25 March 2024.

2. Aim of our Fair Ranking CR

2.1 Taking into account the nature of the concerns set out in section 1 above which we are seeking to address, the aim of our proposed Fair Ranking CR is to ensure that Google provides fair ranking in its delivery of organic search results by:

- (a) Ranking search results based on objective and non-discriminatory criteria (eg relevance and quality of response to the user's query);
- (b) Providing transparency over how it ranks search results, and sufficient notice of changes that could impact businesses;
- (c) Seeking to minimise material distortions to other markets resulting from its search rankings and presentation policies; and
- (d) Providing an effective mechanism for parties to raise complaints with Google and have them addressed.

2.2 As we set out through the remainder of this document, we consider that the Fair Ranking CR that we are proposing to introduce would likely have very low costs relative to the potential benefits for publishers and consumers.⁵¹

Statutory objective(s)

2.3 As explained in the 'Introduction to the consultation' document, the Act provides that CRs must seek to achieve one or more of three statutory objectives.⁵²

2.4 The proposed Fair Ranking CR would pursue the fair dealing and the trust and transparency statutory objectives (set out in section 19(6) and section 19(8) of the Act respectively) in seeking to ensure that publishers, as users or potential users of Google's general search,⁵³ are treated fairly and able to interact with Google on reasonable terms; and have the information they require to understand the service they are provided and to make properly informed decisions about whether and how to interact with Google in respect of general search services.

⁵¹ See further in section 5.

⁵² Section 19(5) of the Act.

⁵³ These terms have broad meanings: see section 118(1) and (2) of the Act and the explanatory notes to the Act, paragraph 533(f) and (g).

Permitted type(s)

2.5 As explained in the ‘Introduction to the consultation’ document, each CR must fall within an exhaustive list of ‘permitted types’ set out in the Act.⁵⁴

2.6 The components of the proposed Fair Ranking CR would fall under the permitted types set out in sections 20(2)(b), 20(2)(d) and 20(3)(a) of the Act. They would be for the purpose of:

- (a) Requiring Google to give explanations and a reasonable period of notice to users before making changes likely to have a material impact on users – see paragraph 5 of the proposed Fair Ranking CR;
- (b) Preventing Google from applying discriminatory terms, conditions or policies to certain users – see paragraph 4 of the proposed Fair Ranking CR; and
- (c) Requiring Google to have effective processes for handling complaints by and disputes with users or potential users – see paragraphs 6 to 9 of the proposed Fair Ranking CR.

Consumer benefits likely to result from this CR

2.7 Before imposing a CR, the CMA must have regard in particular to the benefits for consumers that it considers would likely result from the CR.⁵⁵

2.8 Consumers would benefit both directly and indirectly from the proposed Fair Ranking CR. We expect the direct benefits would result from greater confidence that Google ranks results based on what content would be of most relevance and highest quality in response to the user’s query.

2.9 Consumers would also likely benefit indirectly because the proposed Fair Ranking CR could reduce business costs by reducing uncertainty about the considerations Google takes account of in its ranking of organic search results, allowing publishers more time to plan effectively for and respond to changes in Google’s approach to search ranking; and could provide more effective routes to raise issues and ensure they are effectively addressed. Such a reduction in costs could be more effectively used by businesses to enhance investment in product or services improvements, the development of

⁵⁴ Sections 19(9) and 20 of the Act.

⁵⁵ Section 19(10) of the Act.

new products or services, or reduction in prices for products or services paid for by consumers.

- 2.10 Consumers could also stand to benefit from more effective functioning of markets, due to the elimination or mitigation of some of the distortions caused by Google's ranking changes leading to more vigorous competition, greater innovation, lower prices and higher quality options for consumers.
- 2.11 We expand on the potential benefits of this measure to consumers and other parties in our proportionality assessment in section 5 below.

3. Our proposed Fair Ranking CR and Interpretative Notes

Fair Ranking CR

3.1 Having identified our aim (see paragraph 2.1) based on the concerns identified in section 1, we are proposing to impose the following proposed Fair Ranking CR on the basis of the effectiveness and proportionality analysis set out in sections 4 and 5 respectively.

Definitions

1. In this conduct requirement:
 - a. **broader generative AI services** means Google's generative AI-dependent products and services offering information retrieval capabilities outside of general search, such as Gemini AI Assistant and the Vertex AI API;
 - b. **CMA** means the Competition and Markets Authority;
 - c. **general search** has the meaning given to it in the SMS Decision Notice dated 10 October 2025, as revised from time to time;
 - d. **publishers** means any party that makes content available on the web to UK users;
 - e. **search generative AI features** means Google's generative AI-dependent features offered within general search, such as AI Overviews and AI Mode; and
 - f. **SERP** means Google's search engine results page.

Scope

2. The following obligations shall apply to Google in the context of:
 - a. the ranking and presentation of organic search results including web results, images and videos;
 - b. the ranking and presentation of organic search results within search generative AI features; and
 - c. the ranking of organic search results relative to search features and/or search generative AI features on the SERP.
3. Nothing in this conduct requirement shall apply to Google's ranking or presentation of paid-for search results, features or content.

Non-discrimination and objectivity

4. When making any decision related to the matters set out in paragraph 2, Google shall apply objective and non-discriminatory criteria. This means Google:
 - a. shall not take into account whether or not a publisher:

- i. has chosen to advertise on Google;
- ii. has entered into other commercial or contractual arrangements with Google;
- iii. has chosen to opt out of its content being used for Google's search generative AI features or any Google service outside of general search; or
- iv. has exercised contractual or statutory rights against Google; or

b. shall apply the same, objective criteria in relation to its own products and services and the equivalent products and services of third parties.

Transparency

5. Google shall provide publicly:

- a. sufficient information about how it undertakes the matters described in paragraph 2; and
- b. sufficient notice and information in advance of any material changes to the key ranking criteria, policies and procedures that affect the matters described in paragraph 2.

Non-distortion and complaints

6. Google shall provide a clear and accessible process for handling complaints from publishers in relation to its policies and procedures related to any of the matters described in paragraph 2, which allows publishers to indicate any potential adverse impacts on the functioning of any market in the United Kingdom in which they are active.

7. Google shall provide the CMA with regular summaries of the complaints it receives through the process established pursuant to paragraph 6.

8. If, having reviewed the summaries received pursuant to paragraph 6, the CMA considers that a specific policy or procedure (or combination of policies and procedures) related to any of the matters described in paragraph 2 may be having a material adverse impact on the functioning of any market in the United Kingdom, Google shall produce and publish a report examining:

- a. whether the identified policies or procedures are having a material adverse impact on the functioning of any market in the United Kingdom; and
- b. if so, what steps Google proposes to take to reduce or remove any such adverse impact.

9. In addition to the complaints process described in paragraph 6, Google shall also publish an alternative dispute settlement mechanism for publishers that have been manually excluded from Google's general search index.

Interpretative Notes

3.2 The CMA may publish interpretative notes to accompany a CR. Interpretative notes will provide greater clarity over the CMA's interpretation of a CR, including how it may apply in particular circumstances, for the benefit of both the SMS firm and other industry participants.⁵⁶ It would be open to the SMS firm to take a different approach to the one outlined in the interpretative notes where it is able to demonstrate to the CMA that its approach complies with the terms of the CR.⁵⁷

3.3 We propose that the Fair Ranking CR be accompanied by the following set of interpretative notes.

Scope

1. As set out in paragraph 2 of the conduct requirement, this requirement applies to:
 - (a) the ranking and presentation of organic search results (which we expect to include results such as web results (blue link feed), including when displayed within a search feature, such as People Also Ask, Top Stories and other equivalent features);
 - (b) the ranking and presentation of organic search results within content generated through Google's search generative AI features (which currently include AI Overviews and AI Mode); and
 - (c) the ranking of organic search results relative to (i) features containing organic search results; (ii) Google's search generative AI features; and (iii) other search features (which is expected to include in-set maps and integrated links to Google's related products (eg specialised search services and YouTube)).
2. For the avoidance of doubt, the principles do not apply to:
 - (a) the design and presentation of other search features (as described in paragraph 1(c) of these interpretative notes); or
 - (b) the ranking, design and presentation of paid-for (sponsored) content, including the placement of, or amount of space on the search results page allocated to, paid-for (sponsored) content.
3. The conduct requirement sets out a series of requirements on Google intended to ensure that its relevant decisions lead to search results that are non-discriminatory and objective, transparent, and non-distortive.

⁵⁶ [Digital Markets Competition Regime Guidance](#) (CMA194), December 2024, paragraphs 3.59 to 3.60.

⁵⁷ [Digital Markets Competition Regime Guidance](#) (CMA194), December 2024, paragraph 3.61.

Non-discriminatory and objective

4. Google's relevant ranking decisions should be based on objective and non-discriminatory factors that provide users with the most relevant and high-quality results to their specific query. Google should therefore not take account of any of the irrelevant considerations set out in paragraph 4.a. of the conduct requirement when making any decisions that fall within the scope of this conduct requirement.
5. Paragraph 4.b. of this conduct requirement requires Google to take decisions that fall within the scope of the conduct requirement in relation to its own products on the basis of the same objective and non-discriminatory criteria (eg relevance, quality, and user context) as it applies to equivalent third-party content. For the avoidance of doubt, and in the context of paragraph 2.c. of the conduct requirement and the explanation of scope at paragraph 1(c) of these interpretative notes, the fact that a search feature (eg the Flights Module) might be designed and presented to only include Google inputs would not be relevant to paragraph 4.b. of the conduct requirement, but Google's decision on where that search feature is ranked on the page would be.
6. The CMA recognises that introduction of new search features is likely to require testing and development. Nothing in paragraph 4 is intended to reduce or undermine Google's ability to introduce such new features.

Transparent

7. The information that Google is required to provide about its ranking of relevant results pursuant to paragraph 5.a. of the conduct requirement must be sufficiently detailed to allow publishers to understand how ranking decisions are made and to identify possible instances of discrimination or distortion. We would expect this to, at a minimum, cover:
 - (a) the ranking criteria relevant to the matters described in paragraph 2 of the conduct requirement; and
 - (b) the ranking policies and procedures involved in the matters described in paragraph 2 of the conduct requirement.
8. Similarly, the information Google is required to provide pursuant to paragraph 5.b. of the conduct requirement must be sufficiently detailed to allow businesses to understand how material changes to its ranking criteria, policies and procedures are likely to affect ranking, and to identify possible instances of discrimination or distortion. The CMA would therefore expect Google to set out at a minimum:
 - (a) for changes to policies and procedures: the nature of the change, its purpose (including key specifications) and potential publishers that may be affected by the change; and

(b) for changes to key ranking criteria: the outcome or objective of an intended change, but not any proxy signals relied on to inform ranking scores.

9. Paragraph 5.b. of the conduct requirement only applies to 'material changes', which the CMA would expect to include changes that are actionable (ie those changes in response to which publishers could take action to avoid or reduce the impact of the change on their ranking), made to meet a specific policy objective (eg preventing spam), or where changes are made to comply with a regulatory requirement. We would not require Google to provide advance notice of changes that represent minor everyday ranking improvements. The CMA would also expect 'changes' to include the introduction of new ranking criteria, policies or procedures.

10. For the avoidance of doubt, the requirements set out in paragraph 5.a. and 5.b. of the conduct requirement should not oblige Google to provide detailed information that would undermine the legitimate aim of the policy or ranking decision leading to the update or involve the disclosure of commercially sensitive information.

Non-distortion and complaints

11. Paragraph 6 of the conduct requirement requires Google to have a process for handling complaints and disputes about potential distortions to markets in the UK, arising from its ranking policies and procedures having a discriminatory impact.

12. The CMA would expect this complaints process to be clear, accessible and transparent to publishers that would like to raise concerns with Google. We would expect this to build on existing complaints channels to provide users with a good user experience.

13. Paragraph 7 of the conduct requirement requires Google to provide the CMA with summaries of the complaints received on a regular basis. The CMA would expect such reports to:

- (a) include information on the volume and nature of complaints, broken down by policy or procedure, as well as Google's assessment of the 'materiality' of such complaints; and
- (b) be provided on at least a quarterly basis.

14. In the context of this paragraph, the CMA would expect to maintain a dialogue with Google about the nature and scale of complaints in order to inform the interpretation of 'materiality', but the CMA would expect this to be considered with reference to the number of firms affected and the nature and size of the impact on them.

15. Where the complaints received in relation to a ranking policy or procedure indicate that its adverse impact on a market in the UK appears to be material, paragraph 8 of the conduct requirement requires Google to assess whether

it should take further action to address possible material adverse impacts arising from any ranking policy or procedure.

- 16. Google will be required to produce and publish a report in such instances. That report should set out Google's evaluation of the policy or procedure, taking account of all of the circumstances including the aim of the policy or procedure, the scale of the potential distortion identified, and the costs of any such alternative steps.
- 17. Google may also decide to prepare the report described under paragraph 8 without being first directed by the CMA. If it does so, it should inform the CMA of that decision as soon as practicable afterwards.
- 18. In addition to a complaints process for material ranking changes in paragraph 6 of the conduct requirement, Google will also be required to improve the effectiveness of its existing complaints process to allow publishers to complain when Google makes manual decisions to exclude a publisher from its web index. The CMA considers that Google may comply with this obligation by extending the measures it offers to comply with Article 6(12) of the Digital Markets Act to the UK.⁵⁸

⁵⁸ Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828.

4. Effectiveness of our proposed Fair Ranking CR

4.1 Having identified an aim (see paragraph 2.1 above), the CMA must identify a CR, or combination of CRs, that would likely be effective in achieving this aim. As part of this, the CMA will consider both the content and form of potential CRs.⁵⁹ This section explains:

- (a) Our design choices that resulted in the proposed Fair Ranking CR set out in section 3 above; and
- (b) The requirements we consider necessary to secure effective implementation and compliance.

Key design issues we have considered

4.2 To inform and test the shape of the proposed Fair Ranking CR, we have identified a series of key design issues to ensure it effectively meets our aim and mitigates potential risks, including unintended consequences. These include:

- (a) The scope of the Fair Ranking CR;
- (b) How the Fair Ranking CR addresses concerns about discrimination;
- (c) How the Fair Ranking CR addresses concerns about a lack of transparency; and
- (d) How the Fair Ranking CR addresses concerns about market distortions and lack of effective complaints mechanisms.

4.3 The remainder of this section sets our reasoning.

Scope of the Fair Ranking CR

4.4 In our SMS Decision, we explained that for any user query entered into Google Search the information returned on the SERP may include: (i) organic results; (ii) paid results; and (iii) ‘search features’ such as OneBoxes, the Google Shopping carousel, in-set maps and integrated links to Google’s

⁵⁹ [Digital Markets Competition Regime Guidance](#) (CMA194), December 2024, paragraph 3.20(b).

specialised search services.⁶⁰ The SERP also includes search generative AI features, such as AI Overviews.⁶¹

4.5 Given our aim and our analysis of issues in section 1, we propose that the Fair Ranking CR would apply to Google's ranking of all organic search results, including the 'blue link' web results and other search features. In particular, the requirement should cover ranking within specific features, including search generative AI features like AI Overviews and AI Mode, for the following reasons:

- (a) AI Overviews and AI Mode are part of general search services, 'deeply embedded within Search infrastructure' and 'directly powered by search technologies' according to Google.⁶²
- (b) Search generative AI features are rapidly growing in importance as part of Google's search results, with its display rate of AI Overviews [§§] from [§§] to [§§] of UK queries between December 2024 and June 2025.⁶³
- (c) A broad range of stakeholders submitted that covering ranking of search results in search generative AI features would ensure that the application of the Fair Ranking CR would be future proofed.⁶⁴

4.6 We consider, based on the concerns identified in section 1 and the reasons set out in paragraph 4.5, that including Google's search generative AI features will help to secure greater certainty and confidence for business users reliant on Google's general search services, and therefore enhance the overall effectiveness of our proposed Fair Ranking CR.

⁶⁰ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, confirming the views set out at launch of the investigation (paragraph 4.11(c)) and in our proposed decision to designate Google with SMS (paragraph 4.22).

⁶¹ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, paragraph 4.49(b).

⁶² [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, paragraph 4.50.

⁶³ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, [Appendix B – Market Outcomes Annex](#), paragraph B.18.

⁶⁴ [§§] response to the CMA's RFI; [§§] response to the CMA's RFI.

How the Fair Ranking CR addresses concerns that Google may uprank or downrank content for unfair reasons

- 4.7 The first limb of our aim is to ensure that Google ranks its search results based on objective and non-discriminatory criteria.
- 4.8 The Fair Ranking CR therefore includes a requirement that Google should adopt non-discriminatory and objective criteria, to mitigate the risk that Google manipulates the ranking and presentation of search results based on irrelevant and unfair considerations. Compliance with this part of the CR would require that, in determining search ranking, Google does not consider factors such as whether a publisher has chosen to advertise, or otherwise enter into commercial agreements, with Google; and whether a publisher has raised a complaint about Google with a regulator. We would also expect Google to apply the same criteria to third-party content that it applies to its own content.
- 4.9 These factors broadly reflect Google's external commitment codified in its Honest Results Policy.⁶⁵ We consider that imposing a legal requirement, backed by appropriate monitoring requirements (see paragraphs 4.29 to 4.33), to prevent Google from considering such factors in its ranking and presentation of search results will give businesses greater confidence over Google's search rankings, thus enabling more investment in products and services for consumers.

How the Fair Ranking CR addresses concerns that Google does not provide sufficient notice or information when it implements a change to its ranking algorithm

- 4.10 The second limb of our aim is to ensure that Google provides transparency over how it ranks search results, and sufficient notice of changes that could impact businesses.
- 4.11 The Fair Ranking CR therefore includes a requirement that Google would have to:
 - (a) Provide sufficient information about the ranking criteria and policies it relies on to determine how it ranks and presents search results; and
 - (b) Where Google makes material changes to ranking criteria and policies, be clear about what is changing and how that may impact businesses relying

⁶⁵ Google, '[Our Honest results policy](#)', accessed by the CMA on 24 November 2025.

on its service, at least 30 business days in advance of those changes being made.

- 4.12 Google submitted that it already shares a large amount of information about its ranking and presentation of search results in line with the Platform to Business (P2B) Regulations,⁶⁶ including a guide to key ranking systems,⁶⁷ how search ranking works,⁶⁸ Search Quality Guidelines,⁶⁹ and posts on its Search Status Dashboard, Search Central Blog and Search Blog (amongst other channels).⁷⁰
- 4.13 Google also submitted that there are limits to the information that Google can disclose on its ranking (or any changes to ranking). In particular, Google submitted that disclosure of ranking details would have two main adverse consequences:
 - (a) It would make it easier for websites to manipulate Google's search systems to appear more relevant than they are, with adverse consequences for the quality and usefulness of Google Search.
 - (b) Disclosing these details of how Google Search ranks search results would allow competitors to copy innovations and free ride on Google's valuable investments and IP.⁷¹
- 4.14 In particular, Google submitted that it cannot disclose the indirect, proxy signals that it deploys, because this would enable the 'manipulation of search results', as set out in the P2B Regulations.⁷²
- 4.15 We recognise that there may be legitimate reasons to restrict certain public information about ranking where such information enables the manipulation of search results to consumers' detriment by bad actors (via spam, scams or irrelevant content), or where Google's intellectual property or trade secrets are at risk of being expropriated.

⁶⁶ Regulation (EU) 2019, 1150 of the European Parliament and of the Council of 20 June 2019 on promoting fairness and transparency for business users of online intermediation services, as retained and amended in UK law.

⁶⁷ Google, '[A guide to Google Search ranking systems](#)', accessed by the CMA 24 November 2025.

⁶⁸ Google, '[Automatically generating and ranking results](#)', accessed by the CMA 24 November 2025.

⁶⁹ Google, '[Search Quality Rater Guidelines](#)' published on Google Services, dated September 2025, accessed by the CMA on 17 December 2025. To access, click 'Full Guidelines'.

⁷⁰ Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI.

⁷¹ Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI.

⁷² Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI.

4.16 However, we consider that Google should offer more specific information about its search service than it does currently in two key respects:

- (a) How Google applies criteria to optimise search results for ‘whole page’ composition; and
- (b) How Google applies its criteria in the ranking and presentation of content in its search generative AI features (eg AI Overviews and AI Mode).

4.17 We consider that greater transparency about the points set out in paragraphs 4.16(a) and (b) should allow businesses to be better able to optimise their performance and respond to changes, while also being able to identify the cause of, and mitigate, potential unintended material negative impacts or costs to their business. We have set out in our interpretative notes (see section 3 above) how Google should approach this.

How the Fair Ranking CR addresses concerns that Google may not sufficiently take into account the impact of its ranking or presentation policies on markets, nor offer an effective complaints procedure for affected publishers

4.18 The third and fourth limbs of our aim are to ensure that Google:

- (a) Seeks to minimise material distortions to other markets resulting from its search ranking and presentation policies; and
- (b) Provides an effective mechanism for parties to raise complaints with Google and have them addressed.

4.19 The proposed Fair Ranking CR addresses this through two separate requirements, as set out below.

Consideration of impacts of ranking or presentation policies on markets

4.20 This part of the Fair Ranking CR addresses the concerns that Google does not currently have:

- (a) Sufficient incentives to appropriately consider or mitigate the wider impacts of its ranking and presentation policies (and changes and updates to those policies) on other markets; nor
- (b) An effective complaints procedure to allow publishers to raise concerns about those potential impacts on other markets.

4.21 The Fair Ranking CR would require Google to:

- (a) Introduce a complaints process for publishers to raise concerns about potential distortions to markets arising from its ranking policies; and
- (b) Where complaints indicate that the negative impacts (including distortions to effective competition in a market or impacts on the ways firms conduct their business) may be material, prepare and publish a report assessing whether there are any such impacts on markets and, if so, identifying what steps, if any, it will take to mitigate these impacts.

4.22 As set out in section 1, paragraph 1.17(a) and (b), we have identified two primary case studies of recent changes which illustrate the types of issues which we would expect this requirement to address, and that may meet the material impact threshold and therefore require an *ex post* evaluation – Site Reputation Abuse and SafeSearch Policy.

4.23 In response to the CMA's questions regarding this complaints process, Google made three points:

- (a) The potential complaints mechanism should build upon current processes (eg SafeSearch and Spam).
- (b) The assessment of 'material negative consequences' should be viewed through the lens of 'unintended ranking impacts' involving Google's existing policies that make use of algorithmic classifications.
- (c) The assessment of 'materiality' should focus on the volume of complaints as the only suitable, objective metric for gauging materiality of an update's impact.⁷³

4.24 We expect to maintain regular dialogue with Google about the interpretation of 'material impacts' to inform when Google should carry out an evaluation to consider if there are further steps it can take to mitigate distortive impacts where the threshold has been met.⁷⁴

4.25 We expect this requirement will ensure businesses have an effective way to raise issues with Google's changes to search rankings and ensure they are addressed. It could also help to mitigate negative impacts of changes on other

⁷³ Google's submission to the CMA.

⁷⁴ Where distortive effects occur as a consequence of pursuing a legitimate policy objective (eg to comply with UK or other international regulation) then we would expect to consult regulatory counterparts (such as Ofcom in respect of the Online Safety Act 2023) to inform Google's *ex post* evaluation.

markets, thereby ensuring they function more effectively in the interests of consumers.

Effectiveness of complaints process to raise and resolve publisher concerns in relation to their manual exclusion from the web-index

- 4.26 This part of the Fair Ranking CR addresses the concerns that Google does not currently have an effective complaints process in relation to publishers' manual exclusion from the web-index (see section 1, paragraph 1.23).
- 4.27 The Fair Ranking CR would require Google to have an effective complaints process for publishers to raise such concerns. We expect this may be addressed by extending the existing complaints process set up in the EU to comply with Article 6(12) of the DMA, and the latter element to be addressed by the process set out in relation to how Google may address potential distortive impacts.
- 4.28 We expect this requirement would make sure that businesses have an effective way to raise issues with their exclusion from search results, and ensure they are addressed and any detrimental effects mitigated.

Implementation and compliance

- 4.29 A CR comes into force at a time determined by the CMA.⁷⁵ Once in force, Google would be required to provide the CMA with a compliance report in relation to that CR⁷⁶ and the CMA would be required to keep under review the extent to which Google is complying with the CR.⁷⁷ This section sets out our proposed approach to ensure any final Fair Ranking CR is implemented effectively and to monitoring compliance.
- 4.30 We propose that the requirement would come into force within six months following imposition. During this period Google should, within one month of imposition, submit an implementation plan and engage constructively with the CMA and third parties to develop and implement changes to comply with the requirement.

⁷⁵ Section 19(11)(a) of the Act.

⁷⁶ Section 84(1) of the Act.

⁷⁷ Section 25(b) of the Act.

4.31 In relation to the CMA's questions on implementation and compliance monitoring, Google made the following two principal representations:⁷⁸

- (a) Google submitted that compliance is not costless and frequent reporting imposes significant burdens on Google, both in terms of operational costs and diversion of resources from its primary product development activities. It submitted that in line with other regulatory frameworks, annual reporting is sufficient and proportionate, and the general cadence of engagement should be no more than biannual to avoid being overly burdensome as it would otherwise dull search innovation for UK consumers.
- (b) Google also submitted that it did not understand the need for or value of a third-party baseline audit. Google considered that it is best placed to efficiently and effectively identify and understand its own internal processes. Google also submitted that a third-party audit would involve significant costs and increase the internal operational burden, without delivering clear benefits, and would therefore be disproportionate.

4.32 Drawing on our guidance, Google's representations and our own internal assessments of the most effective means for Google to demonstrate compliance, we consider that, as a minimum, Google would need to do the following two things to demonstrate compliance with the Fair Ranking CR:

- (a) First, establish auditable internal processes, including in relation to material changes to search ranking and presentation policies, the impact of any commercial (eg contractual) arrangements with publishers on search ranking and presentation policies, and complaints Google receives about its ranking and presentation of search results.

These measures play an important part in making sure that Google will be able to demonstrate that it is not taking account of irrelevant or unfair considerations in its ranking of organic search results, in the event that third-party raise credible complaints that merit detailed evaluation of.

- (b) Second, carry out, submit and publish a baseline compliance audit. We recognise that appointing a 'skilled person'⁷⁹ may introduce some further costs that Google would not have to bear if carrying out its own internal

⁷⁸ Google's submission to the CMA.

⁷⁹ Section 79 of the Act, pursuant to which the CMA may appoint a 'skilled person' to provide it with a report about matters relevant to its digital markets functions in relation to a designated undertaking. See CMA194 paragraphs 5.68-5.80.

compliance audit. However, given that the core issue we are seeking to address is a lack of trust by publishers that Google abides and implements its policies in its ranking of results, we provisionally consider that there is an intrinsic value in a baseline report being carried out by an independent third party.

- 4.33 Following this baseline compliance audit, Google would be required to submit to the CMA and publish six-monthly compliance reports, supplemented with regulatory dialogue on a six-monthly basis.

5. Provisional proportionality assessment for the Fair Ranking CR

- 5.1 The CMA may only impose a CR if it considers that it would be proportionate to do so for the purposes of one or more of the statutory objectives, having regard to what the CR is intended to achieve (set out in paragraph 2.1 above).⁸⁰
- 5.2 This section sets out our provisional proportionality analysis for the proposed Fair Ranking CR. A proportionate CR is one that:
 - (a) Is effective in achieving its intended aim;
 - (b) Is no more onerous than it needs to be to achieve its intended aim;
 - (c) Is the least onerous CR, where the CMA has identified multiple equally effective options that would achieve the intended aim; and
 - (d) Does not produce disadvantages that are disproportionate to its aim.⁸¹
- 5.3 We have provisionally considered each of these four criteria below. However, we will revisit our assessment of all four in light of responses to the consultation, and make a final determination about whether to impose the Fair Ranking CR.

The CR is effective at achieving its intended aim

- 5.4 The analysis set out above shows how the proposed Fair Ranking CR is designed to be effective in meeting our aim.

The CR is no more onerous than necessary

- 5.5 The Fair Ranking CR we have set out seeks to be effective in meeting our aim while minimising the burdens for Google and other parties. For example, we have:
 - (a) Limited the scope of application of the requirement to organic search, where the majority of our concerns have been identified; and

⁸⁰ Section 19(5) of the Act.

⁸¹ CMA194, paragraph 3.33.

(b) Proposed a complaints-led process to target the distortion part of the Fair Ranking CR to target assessments Google is required to undertake of ranking changes to those with material negative consequences. This complaints-led process would enable Google to focus on those issues raised by parties rather than trying to anticipate and mitigate every potential issue ahead of time.

5.6 We therefore consider that, given our analysis of the key design choices set out above, the Fair Ranking CR is no more onerous than necessary.

The CR is the least onerous of equally effective options that would achieve the same aim

5.7 We have not identified any alternative CR requirements that could meet our aim.

5.8 Google proposed an outcomes-based transparency CR. We set out below our assessment of why we consider this not to be an equally effective option to achieve our aim.

Google's proposal

5.9 Google proposed to affirm its commitment to carrying out its search ranking on fair and non-discriminatory criteria through a transparency-based solution. Google submitted that its proposal would pursue the statutory objective of trust and transparency and fall under the self-preferencing permitted type.⁸²

5.10 In response to the CMA's questions, Google identified the following changes which could be made to comply with this measure:

- (a) Make a public commitment to continue to comply with fair ranking principles, as outlined in its Fair Wholepage Composition Policy and the Honest Results Policy (and to publish an external-facing version of the Fair Wholepage Composition Policy).
- (b) Host (jointly with the CMA) an annual roundtable for relevant stakeholders, to provide a forum for these parties to raise their views about Google's ranking practices and allow Google to directly explain its approach to ranking. In addition to trust-building, the roundtable would

⁸² Google's submission to the CMA. Sections 19(8) and 20(3)(b) of the Act.

allow Google to gather feedback from stakeholders and use this to inform the contents of the annual report.

(c) Produce public and CMA-facing versions of an annual report which explain how Google has implemented fair ranking principles that year. The CMA-facing annual report would confidentially explain in detail a sample of representative launches and key metrics (which could include metrics to evaluate user helpfulness for launches). Given the extreme sensitivity of Google's internal search evaluation metrics, the public-facing annual report would need to be higher-level to safeguard Search from security and spam threats. The discussion from the stakeholders' roundtable (see above) would feed into the public-facing annual report.⁸³

5.11 There is some overlap between Google's proposal and the transparency elements of the Fair Ranking CR and we consider that Google's proposal would result in a marginal improvement to the current level of transparency about its ranking of search results.

5.12 It would not, however, effectively address all of the issues we are seeking to address through this intervention (see section 1) and therefore would not be equally effective in achieving our aim (see paragraph 2.1 above) as the proposed Fair Ranking CR.

5.13 Taking the elements of our aim in turn:

(a) **Ensuring that Google ranks search results based on objective and non-discriminatory criteria:** we do not consider that a requirement to comply with principles set out in Google's own policies is sufficient. As set out at paragraph 1.9(a) above, we do not consider that it is sufficiently clear how Google's policies apply to search generative AI features, so these are not sufficient to ensure that ranking within those features is fair. More generally, there is a clear circumvention risk that Google amends its policies subsequently to change the principles and therefore change the nature or extent of its obligation. This therefore does not provide an equally effective mechanism for the CMA to monitor and, if necessary, enforce any possible unfair ranking by Google compared to the proposed Fair Ranking CR.

(b) **Providing transparency over how it ranks search results and sufficient notice of changes that could impact businesses:** Google's

⁸³ Google's submission to the CMA.

proposal includes publication of a version of its Fair Wholesale Composition Policy which largely matches our proposed Fair Ranking CR requirements on this point. However, this proposal cannot be effective in meeting our aim since it does not include anything to address the issues we identified in section 1 above about the lack of information provided to publishers in relation to changes Google makes to its search ranking policies.

(c) **Seeking to minimise material distortions to other markets resulting from Google's search rankings and providing an effective mechanism for parties to raise complaints with Google and have them addressed:** given the limitations on attendees, the potential for a distortion to occur over a significant amount of time before it can be raised and considered, and the lack of any substantive obligation on Google to consider complaints, we do not consider that an annual roundtable with stakeholders would be equally effective in identifying and, where relevant, addressing potential distortions to markets as our proposed Fair Ranking CR approach. For the same reasons, it also does not appear an effective way for publishers to raise concerns about being manually removed from the web-index (see paragraph 1.23).

5.14 Based on the above reasoning, we consider that Google's proposal would not be an equally effective proposal to meet our stated aim.

The CR does not produce disadvantages which are disproportionate to the aim

5.15 In the assessment below, we set out the main potential costs and benefits of the Fair Ranking CR for Google and other parties and our assessment of their relative sizes. On the current evidence, we consider that the potential benefits would outweigh the potential costs and therefore the CR would not produce disadvantages which are disproportionate to the aim.

Potential costs of the CR

Costs to Google

5.16 For the non-discrimination part of the Fair Ranking CR, we consider that compliance requires Google to do what is broadly reflected in its Honest Results Policy. As such, we consider any additional costs to Google to be in the form of extra compliance costs as a result of its existing internal policies becoming legally binding. Google submitted that the forward-looking

compliance, reporting and monitoring infrastructure that sits around formalising a voluntary practice as a legally binding CR represents significant new additional costs of [up to £5 million over a five-year period].⁸⁴ We consider this a reasonable proxy of what the additional cost could be for this part of the Fair Ranking CR.

- 5.17 The non-distortion part of the Fair Ranking CR would result in extra costs to Google in engaging with complainants, reporting to the CMA and carrying out a relatively small number of investigations. While we have not received any estimates from Google of these costs, based on the types of costs and the relatively small number of investigations expected, we consider the cost of this part of the CR would be unlikely to exceed £1 million annually.
- 5.18 The transparency part of the Fair Ranking CR would require Google to incur engineering costs to publish updates for changes. We note that Google has submitted that it already shares a large amount of information about its ranking and presentation of search results. Based on Google's estimate of these costs, adjusting for the inclusion of a materiality threshold, we consider the cost of this part of the CR would be unlikely to exceed £1 million annually.⁸⁵
- 5.19 This gives an estimate of total costs to Google of up to [£15 million over a five-year period].

Potential benefits of the CR

- 5.20 The main benefits of the Fair Ranking CR would be:
 - (a) Increased confidence in the fair operation of Google's organic search ranking and greater clarity, leading to increased investment and innovation;
 - (b) Reduced costs to businesses; and
 - (c) More effective functioning of markets due to the elimination or mitigation of some of the distortions caused by Google's ranking changes.

⁸⁴ Google's response to the CMA's RFI.

⁸⁵ Google estimated that without a materiality threshold the total costs would be [up to £5 million] per annum based on a total of [less than 1,000] relevant changes – encompassing the full spectrum of core updates to Google's ranking algorithm, as well as changes to Google's search policies, SERP features and SERP layout. If focusing only on core updates, Google's [list of core updates](#) included just four updates for 2025 and seven for 2024. Google's response to the CMA's RFI; and Google's response to the CMA's RFI.

5.21 The below section sets out why we consider these benefits would likely arise and an indication of their possible scale.

Increased confidence in the fair operation of Google's organic ranking and greater clarity

5.22 There are several ways in which the Fair Ranking CR, by increasing confidence in the fair operation of Google's organic rankings and providing clarity, could contribute to firms being able to increase investment and innovation.

5.23 First, as described at paragraph 1.9, our evidence gathering has shown that there is currently a perception that Google manipulates rankings to:

- (a) Provide more favourable treatment of its own services (eg YouTube) compared to its rivals, or favour businesses with which it has a commercial relationship (eg Reddit); and
- (b) Use rankings as leverage against businesses reliant on Google (eg punishing businesses for opting their content out of Google's advertising features or for appealing Google's manual actions).

5.24 The first of these two points may leave competing firms⁸⁶ facing uncertainty regarding the traffic they are likely to receive from Google Search. Such uncertainty is likely to impact their incentives to make investments in product developments and other innovations. In part, this is because businesses may be concerned that they are unlikely to reach sufficient numbers of users to justify the initial investment since other providers will always be given greater prominence in organic rankings purely due to a relationship with Google.

5.25 The second of these two points can impact how businesses engage with Google. One publisher noted that a lack of transparency affected how it approached commercial negotiations with Google,⁸⁷ another how it was concerned that appealing to Google could have even broader adverse impacts for its business,⁸⁸ and two publishers raised concerns that opting out of certain Google features could have an impact on their ranking.⁸⁹

⁸⁶ Either competitors to Google's services or competitors to those firms with a commercial relationship with Google.

⁸⁷ [X] response to the CMA's RFI.

⁸⁸ [X] response to the CMA's RFI.

⁸⁹ [X] response to the CMA's RFI; [X] response to the CMA's RFI.

5.26 We have also received evidence that more advanced notice for changes to Google's ranking algorithm and policy would benefit businesses (see paragraph 1.13). In particular, some third parties noted that the potential volatility (or lack of predictability) of changes to Google's search rankings could make planning difficult (see paragraph 1.14).

5.27 In combination, these perceptions and lack of predictability regarding changes are likely to reduce the confidence and ability of effected businesses to make investments, for example because businesses are concerned that a rival product will receive greater prominence purely based on a relationship with Google or because a firm is concerned that a sudden change may undermine the case for an investment.

5.28 The Fair Ranking CR would counteract these perceptions and will lead to greater clarity for businesses. Specifically:

- (a) The non-discrimination and transparency aspects of the proposed Fair Ranking CR would address perceptions that Google manipulates rankings, as described at paragraph 5.23; and
- (b) The transparency element would provide businesses with notice of changes to Google's ranking algorithm and policy, addressing issues such as those described in paragraph 5.26.

5.29 We therefore expect that this would provide these businesses with greater confidence to take decisions that are in their commercial interests and to increase investment and innovation to the benefit of users. This is especially so in circumstances where Google Search is an important source of traffic for a business.

5.30 It is difficult to accurately quantify these benefits. However, Google has attempted to quantify the economic impact of Google Search and Ads and estimates that, on average, for every £1 a business spends on Google Ads, it receives £8 back in profit from Google Search and Ads.⁹⁰ Given that Google generated £[10-20] billion of search advertising revenue from users in the UK,⁹¹ this implies the economic value of its search and search advertising services to the UK to be more than £[80-160] billion. Given our estimate of the costs of the proposed Fair Ranking CR as [up to £15 million over a five-year period], this would mean that the CR would have to increase the economic

⁹⁰ Google, '[Google's Economic Impact in the UK 2023](#)', published on Google's economic impact website, dated July 2023, accessed by the CMA on 15 December 2025, page 45.

⁹¹ Based on Google's consolidated response to the CMA's RFI.

value of Google's general search and search advertising by less than 0.01% in order for this benefit alone to exceed the total costs of the CR. Given the wide range of businesses impacted by Google search in the UK, we judge this as likely through the channels we have identified.

Reduced costs to businesses

5.31 We are also concerned that in relation to the ranking criteria and associated policies, Google may not have sufficiently strong incentives to be transparent about their operation or when it introduces, or considers introducing, changes to its ranking and presentation of search results. Currently, Google lacks sufficient incentive to consider the impact of its decisions on publishers. This can lead to inefficient outcomes, with third parties incurring costs inefficiently. There are two significant costs firms incur – search engine optimisation (**SEO**) costs and costs of raising complaints with Google.

Reduced SEO costs

5.32 Businesses currently can face undue costs because of a lack of sufficient transparency and notice from Google about changes in its approach to ranking. The transparency component of the proposed Fair Ranking CR should increase predictability for firms, giving them more time to prepare for updates that Google makes to the ranking algorithm. Thereby, the Fair Ranking CR should, if implemented, make the SEO process more efficient and reduce the related costs that businesses face.

5.33 Current spending by businesses on SEO is very significant.⁹² While not all these SEO costs could be avoided, we received submissions that indicated time and resources dedicated to responding to Google ranking algorithm changes would be reduced if there was more notice and more transparency when Google implemented changes. For example:

⁹² We received evidence from several stakeholders regarding the significant costs they had incurred responding to Google's ranking algorithm changes. See: [§] response to the CMA's RFI; [§] response to the CMA's RFI; Skyscanner's response to the CMA's RFI; Yelp's response to the CMA's RFI; Kelkoo's response to the CMA's RFI; [§] response to the CMA's RFI; [§] response to the CMA's RFI. Further, publicly available estimates suggest UK annual SEO spending is likely to be at least several billions of pounds: Mordor Intelligence estimating the global SEO services market at \$75bn annually and IBISWorld estimating annual spend on SEO internet marking consultants in the UK at £22.3bn. Mordor Intelligence, '[Search Engine Optimization \(SEO\) Services Market Analysis](#)', November 2025, accessed by CMA 16 December 2025; IBISWorld 'SEO & Internet Marketing Consultants in the UK – Market Research Report (2014-2029)', November 2024, cited by Studio 36 Digital, '[SEO Costs in the UK: How Much Should You Budget for SEO in 2025?](#)', accessed by the CMA on 16 October 2025.

(a) [X] submitted that when Google implements ranking changes without sufficient notice, engineering resources must be redeployed at short notice. This can lead to emergency website code and content changes. It also creates a situation where ad hoc technical firefighting is required by developer and infrastructure teams.⁹³

(b) Kelkoo submitted that costs faced from ranking drops could have been avoided had Google explained clearly and transparently what was driving drops in rankings.⁹⁴

(c) Dunelm submitted that better clarity on changes to the SERP would prevent a lot of time trying to second guess.⁹⁵

5.34 The above submissions indicate that time and resources would be saved by some businesses if more transparency was provided when Google implements a ranking algorithm change. Given that overall spend on SEO in the UK is likely to be at least several billions of pounds,⁹⁶ a very modest efficiency improvement in the SEO process of less than 0.1% would result in savings that exceed the total expected costs of this part of the Fair Ranking CR (as set out above).

Reduced cost of complaining to Google

5.35 We have received evidence of instances where specific changes made by Google (eg the Site Reputation Abuse Policy and the SafeSearch Policy, see paragraph 1.17) have had significant impacts on the businesses concerned. In those instances, firms, such as those in the sexual wellness products and coupon industries, have tried to engage with Google but struggled.⁹⁷ Having a clearer route for such complaints as well as being fairer would be more efficient, and the non-distortion and complaints aspect of our Fair Ranking CR would address this.

⁹³ [X] response to the CMA's RFI.

⁹⁴ Kelkoo's response to the CMA's RFI.

⁹⁵ Dunelm's response to the CMA's RFI.

⁹⁶ Based on estimates such as: Mordor Intelligence estimating the global SEO services market at \$75bn annually and IBISWorld estimating annual spend on SEO internet marking consultants in the UK at £22.3bn. Mordor Intelligence, '[Search Engine Optimization \(SEO\) Services Market Analysis](#)', November 2025, accessed by CMA 16 December 2025; IBISWorld 'SEO & Internet Marketing Consultants in the UK – Market Research Report (2014-2029)', November 2024, cited by Studio 36 Digital, '[SEO Costs in the UK: How Much Should You Budget for SEO in 2025?](#)', accessed by the CMA on 16 October 2025.

⁹⁷ Lovehoney's response to the CMA's RFI; Note of meeting with [X].

5.36 We have not attempted to quantify these potential savings but note that such complaints can currently be very expensive for the businesses concerned. For example, one sexual wellness provider supplier estimated that it had spent more than £140,000 on addressing its concern in relation to SafeSearch.⁹⁸

More effective functioning of markets

5.37 We expect requiring Google to introduce a complaints process as set out in paragraph 4.21 would ensure businesses have an effective way to raise issues with Google's changes to search rankings and ensure they are addressed. We consider that this could result in consumers benefiting from more effective functioning of markets due to the elimination or mitigation of some of the distortions caused by Google's ranking changes, leading to more vigorous competition, greater innovation, lower prices and higher quality options for consumers.

Provisional conclusion on proportionality of Fair Ranking CR

5.38 Above we identified a number of benefits that our proposed Fair Ranking CR would give rise to. Importantly, the CR would provide benefits to a large number of stakeholders given:

- (a) That the benefits would apply generally to Google's organic rankings, which affect a large number of businesses; and
- (b) They would affect significant costs to businesses (eg SEO costs).

5.39 Given the limited additional costs resulting from the CR, it is likely that an effective CR will have benefits that would exceed the costs of the proposed Fair Ranking CR. Consequently, we provisionally conclude that the Fair Ranking CR is proportionate.⁹⁹

⁹⁸ Lovehoney's response to the CMA's RFI.

⁹⁹ We have not identified relevant notable impacts of this intervention for people with protected characteristics.

6. Questions for consultation

6.1 We welcome views on any aspect of the Fair Ranking CR design or analysis set out above but are particularly interested in stakeholder feedback on the following questions:

General

6.2 Do you agree with the proposed scope of the Fair Ranking CR?

6.3 Do you have any views or evidence on the benefits or costs of the Fair Ranking CR?

Non-discriminatory and objective

6.4 Do you have any views on the non-discrimination part of the Fair Ranking CR? In particular:

(a) Are the requirements sufficiently comprehensive?

(b) Are there other factors which should be included in paragraph 4?

Transparency

6.5 Do you have views on the transparency part of the Fair Ranking CR? In particular:

(a) What should the concept of a 'material change' cover? Eg ranking policy changes, and/or changes to ranking systems (eg core updates).

(b) What are the advantages or risks of including your suggested changes?

Non-distortion and complaints

6.6 Do you have views on the non-distortion and complaints part of the Fair Ranking CR? In particular:

(a) What are your views on our proposed complaints-led process for addressing concerns about distortions, including advantages and risks?

(b) What factors should inform whether the materiality threshold has been reached?

6.7 Do you have views on our proposals for introducing a general complaints process covering manual exclusions from Google's search index?