Views sought: Potential interventions to provide more certainty for developers on app distribution by Apple and Google, as well as to enable developers to request interoperable access to functionality from Apple

Overview

1.   In this document we seek views on proposed commitments from Apple and Google to the Competition and Markets Authority (**CMA**) to provide more certainty and transparency for app developers developing and distributing apps on Apple's and Google's mobile platforms. Proposed commitments from Apple also enable developers to request interoperable access to key functionalities within Apple's mobile operating systems.

2.   Apple's and Google's mobile platforms are used by thousands of businesses across the UK economy to market and sell products and services, including via apps to millions of customers. App developers wishing to distribute their apps on iOS and iPadOS – the operating systems for iPhone and iPad respectively - must distribute through Apple's App Store, and for Android, they are largely reliant on Google's Play Store. All apps distributed on these stores must first successfully pass Apple's and Google's app review processes. It is important that UK app developers understand and are treated fairly during this process and have sufficient certainty that they will be able to continue to distribute their apps and serve their customers effectively.

3.   Similarly, it is important that app developers have confidence that the app store search algorithm will operate fairly and objectively, and that data they provide to Apple and Google in the context of app review will not be used unfairly by these firms, for example to develop their own competing apps. Together these give app developers and others the confidence to invest and grow, without the risk of subsequent, potentially business-ending, changes by Apple and/or Google.

4.   Furthermore, it is important that developers have interoperable access to key functionality in Apple's iOS and iPadOS.[1] Without the ability to access these enabling functions, UK developers cannot create the full range of innovative

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[1] We have heard fewer concerns from developers about lack of access to functionality for Google, where Android allows for broader third-party interoperability.

products and services that they would do otherwise, and UK consumers miss out as a result.

5.   These issues were set out as a priority for action in our roadmaps for Apple and Google, published in July 2025, and our work has been informed by feedback received from SMS firms and third parties on these roadmaps, as well as responses to our invitations to comment and consultations on the proposed SMS decisions.

6.   Apple and Google have now each proposed separate commitments to provide UK developers with increased transparency and certainty in respect of these areas by committing to take action to:

- **App review:** Review apps to be distributed in their app stores, in a fair, objective and transparent manner;

- **Ranking of apps:** Rank apps in their app stores in a fair, objective and transparent manner;

- **Use of data:** Not use data collected for the purposes of reviewing apps unfairly, such as for their own app development purposes; and

- **Interoperable access to key functionality (Apple only):** Ensure that decision-making in respect of requests for interoperable access to key functionality is fair, objective and transparent.

7.   The respective proposals from Apple and Google have been developed separately by the firms, reflecting their different processes and procedures. They are therefore not identical in their approaches. The full sets of proposals are set out in Annexes 1 and 2.

8.   We consider commitments could prove a swift, effective and proportionate way of addressing these specific concerns and we have worked with Apple and Google to interrogate and further develop their proposals. Our goal is to deliver meaningful outcomes to UK consumers and businesses, and we seek to deliver these outcomes in the most effective and efficient way for the specific circumstances, using the full range of tools available to us.

9.   We do not expect that commitments will be appropriate to address concerns following a Strategic Market Status (**SMS**) designation in all circumstances. For example, we are unlikely to pursue commitments where there is significant divergence between us and a firm on what we are looking to achieve, where firms have little incentive to change their conduct, where compliance is difficult to determine, observe or monitor, where measures can

be easily circumvented, or where an SMS firm's historical conduct does not give us confidence it will work constructively with us.

10.   However, we consider there are good reasons to use commitments in relation to these specific issues. Apple and Google already have processes in place to ensure fair, transparent and objective app review, app ranking and use of data. However, some of these processes and procedural safeguards are not sufficiently transparent and many stakeholders that we have spoken and engaged with have told us they do not trust that these processes are being followed. This lack of trust in itself has implications; app developers (and their investors) could be less willing to develop new propositions, particularly those competing with Apple's and Google's own, for fear of how they could be treated. Similarly, in relation to Apple's interoperability process, we heard concerns that it was unclear how developers could raise requests for interoperability with Apple or how these requests would be considered, and a lack of confidence that such requests would be treated fairly and objectively.

11.   In this context, the focus in these commitments is on:

- Codifying some of the existing processes and safeguards Apple and Google already have in place;

- Providing greater transparency for developers in relation to these processes and safeguards, as well as on the outcomes they deliver;

- Introducing new measures to provide additional safeguards and reassurance

- Enabling developers to request interoperable access to functionality from Apple;

- Providing appropriate mechanisms for developers to raise complaints with Apple and Google and for independent third-party dispute resolution; and

- Ensuring that there are robust reporting mechanisms in place to enable us to monitor how Apple and Google are delivering on the commitments, assess on a continuous basis their effectiveness, and provide reassurance to stakeholders. These reporting measures will be supplemented by use of our formal information gathering powers.

12.   We consider that the proposed commitments could provide greater certainty to all developers that their apps will be reviewed, ranked and their data used, fairly, objectively and transparently by Apple and Google. The proposed commitments from Apple should also provide greater certainty to developers

requesting access to functionality within Apple's mobile operating systems. This should enhance developers' confidence to bring new and innovative propositions to market, in turn ensuring that UK consumers have access to a wide range of products and services on their mobile devices.

13.   We will move quickly to bring forward conduct requirements, including considering whether more stringent measures are necessary, if these commitments are not adhered to or we find they are proving ineffective. For example, if we find Apple is routinely declining interoperability requests without good reasons, this will inform our pipeline of wider work – and we could bring forward specific interoperability requirements. Furthermore, any non-compliance with these commitments would mean that we would be unlikely to consider commitments as a similar approach in future for that SMS firm.

14.   We welcome views on the respective proposed commitments provided by both Apple and Google individually, as well as views looking at both approaches in the round. We will consider views alongside ongoing engagement with stakeholders and will take these into account in continuing to consider Apple's and Google's proposals. Subject to stakeholder views, we would expect Apple and Google to roll out the commitments on 1 April 2026.

Commitments proposed by Apple and Google

15.   In this section we provide an overview of the respective commitments proposed by Apple and Google, before providing in the next section more information on how we will monitor the delivery and effectiveness of these commitments. Close scrutiny and monitoring, both by the CMA and third parties, is critical to addressing these concerns, providing developers with the necessary information to give them confidence that Apple and Google are acting in a fair, objective and transparent manner, in line with their commitments.

App Review

16.   UK developers wishing to serve iPhone or iPad customers are reliant on getting their apps onto the App Store, and those looking to distribute an app on Android are largely reliant on being on Google's Play Store. Apple's and Google's respective app reviews (the processes by which app developers submit their apps or updates for review and approval) serve legitimate purposes of ensuring safe and quality experiences for app users. However, failing to be approved, facing delays to approval, or subsequent removal from the respective app store would potentially imperil a product or service, and may cause serious harm to affected consumers.

17.   Through our engagement and evidence gathering from third parties, we heard concerns that Apple's and Google's app reviews and the associated guidelines are often not sufficiently transparent and that they are applied arbitrarily and inconsistently. Stakeholders further submitted that this leads to several challenges for their businesses.[2] For example, one stakeholder outlined that they had to design entire workflows and processes to accommodate for the inconsistency of Apple's review process, which added cost and complexity to their business. This can also result in additional business expenditure.[3] Such concerns in respect of the app review process, or the perception of poor treatment, could, in and of themselves, lead to negative outcomes. Any uncertainty or delay in these review processes could further dissuade app developers from launching new services, particularly those which may compete with Apple's and Google's own apps, and add to their costs and chill innovation. This in turn impacts the range and choice of apps available to consumers.

18.   Apple and Google have each, separately, proposed respective commitments to provide greater certainty to app developers and to ensure app review processes are fair, objective and transparent. Their full proposals are contained at Annex 1 and 2.

19.   Both Apple's and Google's proposed commitments include:

- **Not self-preferencing their apps over those of other developers**. Apple has made a commitment to "conduct its App review process on the basis of the Guidelines and will not preference Apple's competitive interests over those of developers". Google will "implement Play's app review practices fairly, objectively, transparently, on the basis of its published policies and on a non-discriminatory basis".

- **Providing clear expectations for timely app review turnaround times**. Apple "will seek to provide a rejection or approval decision for 90% of app submissions within 24 hours". Google observes that "Google reviews millions of apps and app updates globally each month, with a recent average review time of less than one day".

- **Notifying changes to the app review policies and guidelines.** Apple has made a commitment to "announce any material changes to the Guidelines to developers on the same day such changes become

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[2] Coalition for App Fairness's response dated February 2025 to invitation to comment dated 23 January 2025, page 6. [link]; BBC's response dated February 2025 to invitation to comment dated 23 January 2025, paragraph 9. [link], Epic Games' response dated February 2025 to invitation to comment dated 23 January 2025, page 4. [link], Note of roundtable with app developers on 24 March 2025, page 2. [link]

[3] BBC's response dated February 2025 to invitation to comment dated 23 January 2025, paragraph 9. [link]

effective". Google will "provide UK developers with reasonable notice, allowing them sufficient time to make necessary changes, regarding material policy updates and new tools relating to Play's app review practices". Google's proposed commitments also provide for "reasonable grace periods for developers to bring their apps into compliance following a policy change. For certain complex policies, developers will also be able to request additional time to meet policy deadlines if needed".

- **Providing reasons and explanations for rejecting apps/updates to allow for prompt resolution of issues.** Apple "will provide the developer with an explanation of how its submission contravenes the Guidelines [...]". Google has made a commitment to "provide UK developers with an explanation for a rejection of an app or update to an app [...]".

- **Giving means to appeal a decision internally and through independent channels.** Apple has made a commitment to "maintain safeguards for developers in connection with any app removal decisions, including the Platform-to-Business (**P2B**) complaints handling mechanism". Google "will provide an independent alternative dispute resolution process that will be available for UK developers, in line with the retained Platform-to-Business (P2B) Regulation".

- **Providing channels to receive complaints.** Apple "will set up and maintain a dedicated channel to receive complaints from developers on its commitments […]" and Google has made the following commitment: "if a developer has a question or concern relating to the app review commitments […], they will be able to reach Google through the general "Contact Us" form within the Play Console".

- **Giving greater transparency through regular public reporting on app review and provision of confidential reports to the CMA for oversight**. These are outlined further in the section on monitoring below.

20.   In addition, Apple has committed to:

- offering support tools to app developers; for example, "where developers have questions about how the Guidelines would apply in scenarios that they believe may not be covered […] Apple will offer developers the opportunity to engage directly with expert App review personnel, including in dedicated 1:1 sessions where appropriate".

21.   In addition, Google has committed to:

- engaging further with developers, including by holding "at least one roundtable event held annually, offering a forum for any interested UK

developers of different sizes to engage directly with Play teams on issues relating to Play's app review process".

22. Many of these commitments should reinforce and enhance practices and processes each of Apple and Google already has in place, albeit internally. In developing these proposals, our main focus has been on greater transparency, predictability and oversight measures to enable app developers and the CMA to effectively monitor if Apple and Google are acting in line with these commitments. In the section below, at paragraph 47 onwards, we set out more detail on the mechanisms we propose to put in place to enable this.

23. We consider that these commitments, including the monitoring mechanisms, should effectively address our app review concerns by providing greater transparency, certainty and confidence for app developers, including with respect to how the app review process works and how the guidelines will be applied, mechanisms for mediation, expected timelines, changes to guidelines, and understanding and resolving any app/update rejections. All of these should enable developers to navigate the app review process more confidently, better plan their app product pipelines, reduce operational risk, and resolve issues more swiftly to accelerate an app's/update's route to market.

24. We welcome views on Apple's and Google's proposed commitments in relation to app review, in particular the importance of a clear commitment on time taken to complete app review, as Apple has provided, in comparison to the historical average Google has provided.

Ranking of apps

25. The discoverability of apps on app stores can be a key factor in determining their overall success, with organic search being a crucial customer acquisition channel for app developers. If Apple and Google can arbitrarily change their approaches to ranking apps, obfuscate reasoning, give their own apps an advantage, or fail to follow a fair, objective and transparent process, then UK app developers may be more reluctant to invest the capital and resources required to improve their services and/or innovate as this gives rise to greater uncertainty over whether they would have a fair opportunity to reach relevant customers. At the same time, users may be less able to find the best services within the app store.

26. These concerns are based on submissions we have received from third parties and responses to our invitations to comment, our consultations on the proposed SMS decisions and the roadmaps, as well as public reports of

potential self-preferencing.[4] For example, one stakeholder submitted that changes to ranking are made with no notice,[5] whilst another noted that Apple and Google have limited incentive to make free apps prominent.[6]

27.   Apple and Google have each, separately, proposed respective commitments to provide greater certainty and confidence to app developers around their app ranking processes. Principally, they propose to do this by committing to operate app ranking in a fair, objective and transparent manner. Their full proposals are contained at Annex 1 and 2.

28.   Both Apple's and Google's proposed commitments include:

- **Not self-preferencing their apps over those of other developers**. Apple will "ensure that its search process is fair, objective and transparent. In particular, Apple will ensure that its approach (including the training of its search algorithm) prioritises user engagement, app quality and delivering users the most relevant results, and does not self-preference Apple's own first-party apps". Google says it "has procedural and operational safeguards in place to ensure that apps on Play will be ranked in a fair, objective, transparent and non-discriminatory way. Play's app ranking will be based on three overarching criteria: (1) user relevance, (2) app quality; and (3) user experience. Play's algorithmic app ranking will apply non-discriminatorily to third-party and first-party apps".

- **Notifying changes to app ranking policies and guidelines.** Apple has made a commitment that for "major changes, for apps on the UK App Store storefront, to the inputs used in its search algorithm [..] or presentation of results that would render the then available public guidance out of date, Apple will: (i) provide a reasonable period of advance notice of approximately one week that such changes will be upcoming; and (ii) update its guidance materials to reflect these changes within a reasonably short period after such changes have been implemented". Google will "provide UK developers with reasonable notice,

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[4] Wall Street Journal, 'Apple dominates App Store Search Results, Thwarting Competitors', dated 23 July 2019, accessed by the CMA on 30 January 2026 [https://www.wsj.com/articles/apple-dominates-app-store-search-results-thwarting-competitors-11563897221?msockid=3ac146220a4a63c01ee050670baa629c].
Financial Times, 'Elon Musk Threatens to Sue Apple Over App Store Rankings', dated 12 August 2025, accessed by the CMA on 30 January 2026 [https://www.ft.com/content/478f385c-dbee-42e8-971f-5ddae23f5a8d].
New York Times, 'How Apple's Apps Topped Rivals in the App Store It Controls', dated 09 September 2019, accessed by the CMA on 30 January 2026 [https://www.nytimes.com/interactive/2019/09/09/technology/apple-app-store-competition.html].

[5] DMG Media response dated 17 February 2025 to invitation to comment dated 23 January 2025 paragraph 23 [link]; DMG Media response dated 20 August 2025 to consultation on proposed decision dated 23 July 2025 paragraph 32 [link].

[6] BBC response dated 28 February to invitation to comment dated 23 January 2025 paragraph 11 [link].

allowing them sufficient time to make necessary changes, regarding policy updates and material changes relating to Play's app ranking. Google will communicate material updates proactively and clearly […]".

- **Providing support tools and resources to developers.** Apple has made a commitment to "provide analytics tools that allow developers to measure and track their search performance". Google has made a commitment to provide "a powerful suite of testing and analytics tools in the Play Console, allowing developers to put Play's guidance into practice".

- **Providing channels to receive complaints**. Apple will "set up and maintain a dedicated channel to receive complaints from UK developers on its commitments [...]". Google has made a commitment that app developers can reach Google through "the general "Contact Us" form within the Play Console, which developers will also be able to use if they have a question or concern relating to app ranking and/or the app ranking commitments […]".

- **Giving greater transparency through regular public reporting on app ranking and provision of confidential reports to the CMA for oversight**.

29. In addition, Google has committed to:

- treat featured apps fairly by selecting "apps for […] curated collections in a fair, objective, transparent and non-discriminatory manner, to ensure that similarly situated third-party and first-party apps are treated the same way".

30. We will closely monitor Apple's and Google's delivery of these commitments as well as their effectiveness. More detail on the mechanisms we have put in place to enable this is set out at paragraph 47 onwards. This will include gathering further information and engaging with stakeholders as necessary.

31. We consider that these commitments, including the monitoring mechanisms, should effectively address our app ranking concerns by providing greater transparency and certainty for app developers, including with respect to how app ranking works, factors that influence ranking and transparency over changes. App developers would be able to optimise their apps appropriately for effective ranking. All of these should enable developers to have greater confidence and certainty in how their apps are ranked, and in their apps having fair opportunity to reach relevant customers.

32. We welcome views on Apple's and Google's proposed commitments in relation to app ranking.

Use of data

33. As part of running their app stores, Apple and Google have access to large amounts of data associated with the apps that they host on app stores, in particular from the review they undertake for new apps and updates.

34. Based on submissions we have received from third parties through information requests and responses to our invitations to comment and roadmaps, we have heard concerns that Apple and Google may use this data to support their own development of first-party apps – giving themselves an unfair competitive advantage over third-party apps and disincentivising innovations from being brought to market by third-party app developers. Stakeholders noted that access to third-party code and data allows Apple and Google to copy innovations from third parties and unfairly improve their own first party apps. [7] One stakeholder, for example, submitted that measures should be in place to prevent Apple and Google, as owners of their respective operating systems, from using data to which only they have access to gain an advantage in developing their first-party apps.[8]

35. Apple and Google have told us they do not use such data for their own competitive advantage and are proposing commitments to provide greater transparency over the systems and controls in place to prevent the use of such data. Their full proposals are available in Annexes 1 and 2.

36. Both Apple's and Google's proposed commitments include:

- **Preventing use of app developers' data for their own apps, products and services.** Apple states that it "has never sought to use the App Store[…], as a means to develop competing features and services". Google "will not use non-public Play data to support the development of its first-party apps".

- **Assurances over the protection of not only app developer data collected during app review, but also data held by virtue of operating app stores.** Apple states that "it has never sought to use the App Store, nor the data it holds by virtue of running the App Store, as a means to develop competing features and services". Google will "safeguard third-party developers' non-public data received in the context of Play's app

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[7] Note of roundtable with app developers on 24 March 2025, page 2 [link].

[8] BBC's response dated February 2025 to invitation to comment dated 23 January 2025, paragraph 28 [link].

review process and non-public data Google has access to from Play's operation as an app store".

- **Transparency over access controls for app developers' data**. Apple has made a commitment that "[a]ny access to this data will require legal review to confirm the business purpose and verify that the intended use does not create a risk of Apple competing with the developers whose data is involved". Google has made a commitment that "Google's data access owners will assess the access request, and will grant access only where the specified use case is appropriate and compliant with Google's data access policies".

- **Transparency over data separation mechanisms**. Apple states its safeguarding processes include "[t]agging developer data submitted as part of App Review as third-party data within Apple's data mapping framework, ensuring that it is subject to the corresponding access restrictions and safeguards". Google states its safeguarding processes include "robust controls [to] technically gate data access" and says that it will "deploy training for relevant data access owners to ensure access to such data is only granted consistent with Google's policies".

- **Providing channels to receive complaints**. Apple has made a commitment to "set up and maintain a dedicated channel to receive complaints from UK developers on its commitments […]". Google has made a commitment to "operate a dedicated channel through which UK developers can submit requests for support, including questions and concerns relating to the use of their non-public data".

- **Giving greater transparency through some public reporting on use of data and provision of confidential reports to the CMA for oversight, including on incidents and complaints**.

37. In addition, Apple has committed to:

- Providing clarity with respect to Apple's Developer Program Licence Agreement Section 9.3 that "Apple does not interpret, and will not apply, Developer Program Licence Agreement Section 9.3 in any way that would undermine the protections and processes it has documented in these commitments to safeguard third-party data".

38. We will closely monitor how Apple and Google are delivering these commitments as well as their effectiveness. More detail on the mechanisms we have put in place to enable this is set out at paragraph 47 onwards. This

will include gathering further information and engaging with stakeholders as necessary.

39. We consider Apple's and Google's proposed commitments, including the monitoring and oversight mechanisms, should effectively address our use of data concerns by ensuring greater transparency over safeguards in place to protect app developers' data from being misused for Apple and Google's own first-party app development. This, we expect, would help support app developers to be more confident that their data will not be used inappropriately or unfairly.

40. We welcome views on Apple's and Google's proposed commitments in relation to use of data.

Interoperability (Apple)

41. Apple's control over its mobile operating systems allows it to control the features and functionality that UK companies can access and incorporate into their services. Whilst Apple provides avenues for developers to request access to functionality not currently available to third parties within its mobile operating systems, the factors which are considered by Apple when making these decisions, the process and timelines in which Apple will consider such requests are unclear. We have also heard concerns that the justification for these decisions is not always clear to developers. This results in limitations in how UK developers are able to develop new products and services. Furthermore, uncertainty reduces incentives to invest in new propositions which require functionality not currently available to third parties. This all feeds through into less choice and innovation for UK consumers in the services available on their mobile device.

42. Our immediate focus in this area is on considering improvements to the process by which developers can request interoperable access to key functionality within Apple's mobile operating systems, with the aim to ensure that Apple's decisions in respect of interoperability requests are fair, objective and transparent.

43. As set out fully in Annex 1, Apple is proposing to take steps to improve its process for requesting interoperable access to functionality, including by committing to:

- **Ensuring a fair, objective and timely dedicated feedback channel for requests for interoperable access.** Apple has made a commitment that "the feedback channel will be available to developers that are members in good standing of the Developer Program and whose account membership

with the Developer Program is registered in the UK […] Eligible requests received through the feedback channel will be placed in a dedicated internal queue for timely review. Incoming requests will be reviewed by a team with specific expertise in iOS and iPadOS interoperability and platform integrity, as well as general technical knowledge of iOS and iPadOS architecture and technologies". Apple will also "make clear the kinds of requests that are eligible for consideration under the feedback channel, namely requests for access to equivalent system and hardware functionality used by Apple services or accessories".

- **Publishing explicit criteria for assessing interoperability requests**. Apple has made a commitment to assess requests against "(i) expected user and developer uptake; (ii) alignment with Apple's platform priorities; (iii) potential implementation costs; (iv) potential impact on user experience, performance/battery, security, safety, privacy, integrity, and accessibility; and (v) potential impact on Apple's intellectual property rights".

- **Transparency on review progress and outcomes.** Apple will "endeavour to provide developers with an update on the status of their requests within four weeks of receiving them." Further, Apple will "inform developers of the outcome of its review of their requests, and the associated reasoning for this outcome".

- **Transparency about changes in iOS/iPadOS.** Apple has made a commitment to "inform developers generally about forthcoming changes to iOS and iPadOS, including those resulting from eligible requests, in its beta releases".

- **Giving greater transparency through public reporting including an overview of requests and certain Key Performance Indicators (KPIs), and provision of confidential additional detail about requests to the CMA for oversight**.

44. We will closely monitor the delivery and effectiveness of these commitments. In particular, we will closely monitor requests made for interoperable access to features and functionality and how Apple deals with these requests. More detail on the mechanisms we have put in place to enable this is set out at paragraph 47 onwards. If information from the request process demonstrates that Apple is routinely declining interoperability requests without good reasons, this will inform our pipeline of wider work and we will consider whether there is a need for specific interoperability measures, such as those we are already exploring in respect of digital wallets and connected devices.

45. We consider these commitments, including the monitoring mechanisms, should effectively address our concerns by providing greater transparency and certainty over the interoperability request process. The proposals should provide developers with the confidence that their requests will be treated fairly, objectively and transparently; and encourage investment in new propositions requiring functionality not currently available to third parties.

46. We welcome views on Apple's proposed commitments in relation to interoperable access requests.

How we will monitor Apple and Google's delivery of these commitments

47. In this section we provide more information on how we will monitor the delivery and effectiveness of Apple and Google's respective proposed commitments. It covers: Apple's and Google's proposed complaints mechanisms; public reporting by Apple and Google; reporting to the CMA; and use of our formal information gathering powers. Close scrutiny and monitoring of Google's and Apple's respective proposed commitments, both by the CMA and third parties, should ensure that app and other developers can have confidence that Apple and Google are acting in a fair, objective and transparent manner, in line with their commitments.

Complaints mechanisms

48. Apple and Google are each proposing complaints mechanisms for developers to raise concerns in relation to the areas covered by these commitments. For example, an app developer who has their app rejected following Apple's or Google's review and does not receive an explanation of the reasons, may seek to raise a complaint through the mechanisms set out in the commitments.

49. Information on complaints received through these mechanisms outlined in the commitments will serve as a useful barometer for whether the commitments have been implemented appropriately and working effectively:

- As part of the commitments, Apple and Google will each report publicly on the total number of complaints received in respect of app review and ranking, as well as the issues complained about;

- Apple will report to the CMA on the numbers and details of any complaints it has received about its UK interoperability request process;

- Additionally, Apple and Google will report directly to the CMA on complaints with respect to use of data. They will also each provide

supplementary information on all complaints such as types of developers the complaints originated from and actions taken/outcomes.

Public reporting

50.   Enhanced public reporting and attestation by Apple and Google should provide greater information and reassurance for stakeholders on the extent to which Apple and Google are each acting in a fair, objective and transparent manner, in line with their commitments. Such transparency may also provide additional incentives for Apple and Google to do so.

51.   As part of these commitments, Apple and Google have both committed to report publicly on a range of metrics and measures to allow stakeholders and the CMA to understand how they are delivering against their respective commitments. This would go beyond existing transparency reports that Apple and Google publish today.

52.   For Apple, public reporting includes:

- Public attestation that it has delivered its commitments, including to have communicated material changes in a timely manner;

- Publishing information and developments on support, tools, and other resources as and when they are available;

- UK-specific information on the performance of app review and ranking processes, including for example, volume of reviews, rejections, approvals and appeals, number of expedited reviews;

- Information on time taken for app review;

- Number of complaints under the P2B mechanism, including for example number of complaints filed, and average time to process complaints; and

- For the interoperability request process, overview of third-party requests incorporated into its feature development cycle.

53.   For Google, public reporting includes:

- Public attestation that it has delivered its commitments, including that significant updates to policies and/or practice were communicated in a timely manner;

- Regularly informing UK developers about helpful resources relating to Google's app review and app ranking processes, and how to access them;

- Aggregate anonymised, UK-specific data on app review and enforcement, including submission volume, rejection and suspension rates; and

- Number of complaints, as well as number of appeals relating to app review and ranking.

54. Some of this information – for example public attestations from Apple and Google that they have complied with the commitments – will be published annually. For other metrics – such as app review and ranking performance for the UK – there will be bi-annual updates to enable any concerns to be understood more quickly. We expect this would also provide greater certainty to developers about how Apple and Google are performing against their commitments on an ongoing basis.

55. We welcome views on this proposed public reporting, in particular on the importance of public reporting on the time taken for app review included in Apple's but not Google's proposal.

Reporting to the CMA

56. In addition to public reporting, Apple and Google have each committed to report to the CMA on a regular and confidential basis on a substantial number of additional metrics, to allow us to further scrutinise and oversee the delivery of their commitments.

57. For Apple, these additional metrics include:

- Summary metrics relating to engagement and developer usage of support and resources;

- Explanation of any material changes to support, resources and Guidelines and the rationale for such changes;

- Metrics relating to timing and functioning of app review processes;

- Information on complaints collected through the dedicated complaints channel, as well as any relevant P2B mediations, including a summary of issues mediated and outcomes;

- Descriptions of the objectives that the ranking algorithm is trained to fulfil and key data inputs used to train the ranking algorithm;

- Summary of tests and evaluation reports of use of data safeguards; and

- For Apple's interoperability request process: information on eligible and ineligible requests, timelines for review, complaints, as well as timely notification of changes to criteria and material changes to the feedback channel.

58. For Google, these additional metrics include:

- Usage metrics for support resources and tools including developer sandbox tools and Google Play Academy courses;

- Aggregate data on average and median time taken for app review, including any formal internal timing targets for Play's app review that Google may set in the future;

- The total number of developer complaints and appeals about Play's app review, app ranking, and third-party developer data, including outcomes, as well as frequency and timing of appeals via alternative dispute process through the Centre for Effective Dispute Resolution (**CEDR**);

- Summary of operational measures taken to ensure apps are ranked fairly, objectively, transparently and on a non-discriminatory basis and description of function of ranking process;

- Information on any major incidents relating to the safeguarding of data, and summary of access logging/audition tools.

59. Some of this information will be provided to the CMA annually, whilst other information will be provided on a more regular bi-annual basis. Lists of the metrics Apple and Google have agreed to report on – both publicly and those to be reported to the CMA only – are included in Annexes 1 and 2 respectively.

60. Reporting against these additional metrics is a critical additional element to building a robust picture of Apple's and Google's respective delivery, and the effectiveness, of each of their commitments. These metrics should allow us to further scrutinise how Apple and Google have gone about delivering their commitments in practice.

61. We welcome views on the proposed metrics Apple and Google have committed to report confidentially to the CMA.

Formal information gathering powers

62. In addition to the above reporting that Apple and Google have committed to, we may, as necessary and appropriate, also use our information gathering

powers under the Digital Markets, Competition and Consumers Act 2024 to gather further information to understand the detail of how Apple and Google are delivering their commitments or the extent to which any concerns about the delivery of these commitments warrants further investigation.

Our approach to monitoring

63.   Overall, we consider these mechanisms should allow us to closely monitor and scrutinise Apple's and Google's delivery of their commitments alongside ongoing engagement with stakeholders. We will publish an annual update on our monitoring work. Should our monitoring work signal or lead us to conclude that the commitments are not effective, we stand ready to take further action. The CMA retains the ability to impose Conduct Requirements should developments warrant it.

Next steps

64.   We welcome feedback from stakeholders on the approach as set out in this document, and on the respective proposed commitments provided by both Apple and Google individually, as well as on both approaches in the round. In particular, we welcome views on the metrics proposed to support in monitoring the delivery and effectiveness of the commitments. If you wish to provide such views, please get in touch at mobilesms@cma.gov.uk by 5pm on 3 March 2026. Should any aspects of your views be confidential, we ask that you also provide a non-confidential version of your views alongside.

65.   We will consider views alongside ongoing engagement with stakeholders and will take these into account in continuing to consider Apple's and Google's proposals. Subject to stakeholder views, we would expect Apple and Google to roll out the commitments on 1 April 2026.

Annex:

1) Apple's commitments proposal

2) Google's commitments proposal

3) Annex to Google's commitments proposal