

[A coupon provider's] response to CMA's consultation on the first set of Google search conduct requirements

As the CMA will be aware, [a coupon provider] is a leading digital coupon provider which creates partnership sites with media companies to integrate coupons into the media companies' broader content offerings. [A coupon provider] operates in [redacted] countries including [redacted]. The company operates coupon sites in which advertisers market coupons (such as rebate or discount codes) for online product purchases.

[A coupon provider] operates some stand-alone sites under its own brand, however the company mainly focuses on partnership sites operated in close cooperation with well-known media partners such as [redacted].

[Redacted] explanation of the evolution of Google's site reputation abuse policy¹ and how this has impacted coupon providers such as [a coupon provider]. In fact, as a result of Google's actions under its revised spam policy², [a coupon provider] has lost more than [redacted]% of its turnover globally and more than [redacted]% in the UK.

[A coupon provider] welcomes the opportunity to give its views on the CMA's first set of conduct requirements (CRs) for Google Search.

Fair ranking CR

[A coupon provider] was pleased to see that the CMA's published draft consultation on "fair ranking" CRs explicitly addresses mitigating the negative impacts of Google's SRAP. The CMA rightly acknowledges that Google's SRAP "*could have material negative consequences for the functioning of markets outside of general search*"³. As you will be aware, the European Commission shares the CMA's concerns about the policy.⁴

Given that the CMA has already considered the impact of Google's SRAP, we would have welcomed to see CMA to propose an explicit ban of the policy in its entirety as part of the draft "fair ranking" CR. The CMA has correctly diagnosed the significant harm, but has not yet proposed an effective solution.

It is unacceptable for Google to treat professional coupon providers' services as an 'abuse' of the reputation of a partner's website. [A coupon provider]'s strong view is that the CMA should require Google to remove the policy given the adverse effects it is having on legitimate and longstanding business activities and the funding of press offerings. This would prevent the irreparable harm that is currently being caused to coupon providers, such as [a coupon provider], and their partner press publishers. Google's ranking algorithm is already well capable of ranking websites appropriately without the need for the SRAP to be layered on top, which unfairly 'puts its thumb on the scales' by discriminating against a particular type of legitimate business activity.

However, if the CMA is not minded to prohibit this policy in its entirety, [a coupon provider] provides some concrete suggestions below as to how the CMA may revise the drafting of its "fair ranking" CR to

¹ Updating our site reputation abuse policy | Google Search Central Blog | Google for Developers, available at: <https://developers.google.com/search/blog/2024/11/site-reputation-abuse>. Last accessed 25 February 2026.

² Spam Policies for Google Web Search | Google Search Central | Documentation | Google for Developers, available at: <https://developers.google.com/search/docs/essentials/spam-policies>. Last accessed 25 February 2026.

³ CMA's Consultation: Fair Ranking Conduct Requirement, paragraph 1.17(a).

⁴ Commission opens investigation into potential Digital Markets Act breach by Google in demoting media publishers' content in search results, November 2025, available at: https://ec.europa.eu/commission/presscorner/detail/en/ip_25_2675. Last accessed 25 February 2026.

mitigate the impact of Google’s SRAP on both publishers and coupon providers. In summary, the CR is currently drafted too broadly and too flexibly and would allow the harmful effects of the SRAP to continue. Also, the complaints procedure would be time-consuming and does not provide any guaranteed outcomes for businesses.

Non-discrimination and objectivity

The CMA’s proposed non-discrimination and objectivity CR(4) sets out the requirement that, when making decisions that impact the ranking or presentation of the SERP or search generative AI features, Google shall apply objective and non-discriminatory criteria. CR(4) then lists specific requirements that the CMA intends to impose on Google.

CR(4) could easily be updated to include an additional provision which would have the effect of preventing Google from de-indexing, demoting or otherwise de-ranking publisher content that contains coupons, such as those produced by [a coupon provider]. Suggested drafting would be to include an explicit requirement that the ranking of a publisher’s editorial content must not be jeopardised by their chosen monetisation strategy, including third-party partners, provided that the monetisation strategy does not undermine the core focus of the publisher’s website, and provided that the monetisation strategy does not include activities that are demonstrably bad for the user experience.

A downgrading of all coupon activities is clearly disproportionate to the policy’s aim of maintaining the quality of the highly-ranked websites. Rather than being allowed a blanket policy, Google should be required to set out clearly and precisely what activities are regarded as ‘spam’ and explain why. If that were to occur, companies such as [a coupon provider] would be able to plan their businesses with more certainty to the benefit of both publishers and end users.

[A coupon provider] considers that Google may push back on this proposal on the basis that it considers publisher content with a lower proportion of paid advertising to be preferred by consumers to publisher content with a higher proportion of advertising. We have seen no evidence that this is the case, particularly as end users are easily able to avoid the coupons on a website if they do not wish to visit that part of the website.

Indeed, [a coupon provider] has collected data (which is annexed to this response) to show the contrary - reputable publishers, including news sites, which include coupons have been found to be trusted more by consumers compared to standalone websites that are not run by reputable publishers:

- **Annex 2: User Signals: Analysis** (Italy, 2023–2024): a comparative evaluation of Bounce Rate, Clickout Rate (CR1), Conversion Rate (CR2), and Earnings per Session, analysing [redacted]⁵ (standalone portal) versus [redacted]⁶ (media partnership). The analysis is restricted to shop landing pages with more than 500 total sessions to ensure statistical robustness.
- **Annex 3: User Signals: AOV Analysis** (US, Q1 2022): independent third-party data from [redacted] covering 246 advertisers, which shows that Average Order Value generated through [a coupon provider’s] structured media partnerships was, on average, USD 28 higher per transaction than the broader couponing market, including standalone portals and other competitors.

This data provides objective support for the claim that structured media partnerships generate economically meaningful, high-quality outcomes for advertisers and consumers alike. The consistent outperformance across recognised engagement and transaction metrics raises important questions regarding the factual basis of Google’s characterisation of such models as “low-quality” or “deceptive.”

⁵ [redacted]

⁶ [redacted]

In fact, coupons are one of the most important revenue drivers for publishers, which then use the revenue generated to support their journalistic content creation.

With some greater specificity in the drafting of the CR, we believe that Google can achieve its aim of avoiding activities that users do not like, without undermining the business models of publishers and coupon providers.

Transparency

[A coupon provider] welcomes the CMA's proposal for transparency CR(5), which requires Google to publicly provide sufficient notice and information in advance of any material changes to its key ranking criteria, policies and procedures. However, [a coupon provider] does not consider this to be sufficient as Google still lacks the incentive to mitigate the impact on publishers and their third-party suppliers of changes in its policies.

[A coupon provider] proposes that Google must face greater accountability in relation to changes to its policies or the introduction of new policies. For example, above a certain threshold, Google should be required to present an impact assessment to the CMA, and to the most directly impacted businesses, for consideration. The threshold could, for example, be that the policy is anticipated to result in a 10% traffic reduction in relation to particular search vertical (e.g. news, shopping, etc) or to a particular category of businesses (e.g. coupon providers, etc). Any policies meeting such a threshold would be suspended until approved by the CMA, and the views of the most directly impacted businesses would be taken into account by the CMA in making its approval decision. Alternatively, a slightly softer version would be for the CMA to have the opportunity to object to a change within a certain timeframe, and if it does not do so, Google would be free to implement the change.

Non-distortion and complaints

Whilst a rigorous complaints procedure is always desirable, this would not prevent the ongoing harm to coupon companies, such as [a coupon provider], as a result of Google's SRAP, or any similarly harmful future policy. [A coupon provider] believes that the complaints process could, and should, be strengthened. What matters first and foremost are clear substantive limitations of Google's discretion to define policies that are aimed at weakening competing business models and strengthen its own business. A complaints procedure can only ever be as helpful as the substantive requirements to judge the conduct against. Therefore, the CMA's focus should be on defining clear "fair ranking" criteria. A right to complaint is pointless, if the business has no legal basis to complain. The complaint procedure is only secondary to those rules.

Regarding such procedure, CR(6),(7) and (8) set out a complaints handling mechanism, whereby publishers may complain to Google, which then, in its own discretion, provides summaries of complaints to the CMA, which then can request a report from Google assessing whether a policy is having a material adverse impact and setting out the steps Google proposes to take to address it. Not only is this a lengthy process, but even at the end of that process it does not follow from the CR that the CMA can bind Google to any particular outcome if it disagrees with Google's assessment or the steps Google has proposed. The CMA would likely have to rely on its residual powers to investigate under the DMCCA, which would be inadequate at preventing significant harm to businesses such as [a coupon provider].

Publisher CR

[A coupon provider] is concerned that, as a result of the increasing proliferation of AI Overviews and AI Mode, coupon codes are being displayed to consumers without a link to the publishers' website. This effectively cuts out the ability for publishers to generate revenue from coupons and restricts their

incentives to enter into agreements with coupon providers such as [a coupon provider], challenging the entire business model.⁷

[A coupon provider] is therefore pleased that the CMA has drafted a standalone CR focused on providing publishers with informed and meaningful choice on how Google uses their content, which is crawled for general search, for the purpose of generative AI.

[A coupon provider] is pleased with the CMA's proposed Controls CR(2), which would allow publishers to opt out of Google AI Overviews without opting out of general search. The interpretative notes confirm that this may be done at both directory-level and page-level for the grounding of search generative AI features. [A coupon provider] assumes that this would allow coupon providers to opt out of individual coupon codes being included in the AI Overview or AI Mode results, without also forcing them to opt out of the rest of their website.

Overall, [a coupon provider] welcomes the CMA's careful consideration of the opt out procedure for publishers.

⁷ For further information, please see [redacted].