

## **AOP Statement – Response to the CMA Consultation on the Google SMS Conduct Requirement – 25<sup>th</sup> February 2026:**

AOP is grateful to the Competition and Markets Authority for the consultation processes that have been undertaken thus far, and with our publisher members over the last couple of years, in relation to Google Search practices.

AOP welcomes the CMA’s decision to exercise its new interventionist powers in digital markets to promote a fairer and more competitive value exchange between publishers and Google Search services; its members response to the recent Conduct Requirement consultations was positively received, the opportunity to understand the CMA’s intended application of the conduct requirements helpful and the explanations behind the reasoning for the proposed conduct requirements insightful.

In this instance, in solidarity for the smaller independent publisher community, not AOP’s typical core membership, but a community whose vulnerability is evident, given their historical underrepresentation in the wider ecosystem, and often in the absence of any direct relationship with Google, with a disproportionate reliance and significant dependency on Google search; AOP has chosen to support a joint submission to this process from the ‘Independent Coalition’, one that includes the Publisher Alliance and IMA.

AOP acknowledges that there has been an extensive period of consultation undertaken by the CMA, discussions that began long before the recent CR roundtable consultations, and accept that from the CMA’s perspective they may consider that certain themes have been exhausted in preliminary discussions; however, these independent publishers have historically had minimum opportunity to articulate the depth of their concerns and for that reason we recognise the importance of having their positions and concerns on the record.

For transparency, AOP have had sight of the NMA and PPA submissions to this consultation. AOP are of the view that both submissions are very well considered; rigour has been applied to ensure thorough consultation processes to ensure these submissions reflect the positions of their respective members. With AOP’s own member base closely reflecting that of these two trade bodies – the majority of AOP’s members will also be a member of one or the other – AOP is broadly supportive of their respective submissions. As example, the NMA’s observations regarding ‘Page Level Controls’ and ‘Publisher Choice Tools’, and the PPA’s positions on ‘Crawler Separation and ‘Fair Payment for Content’ are wholeheartedly supported by AOP.

Association of Online Publishers  
Email: [info@ukaop.org](mailto:info@ukaop.org) Web: [ukaop.org](http://ukaop.org)

These two key areas of alignment between the PPA's submission and that of the Coalition, are on the topics of 'Crawler Separation' and 'fair payment for content'. We understand Google's arguments regarding the challenges of Crawler separation but given that their competitors, such as Microsoft and OpenAI, do provide separate crawlers that enable publishers to exercise meaningful choice, whilst recognising that the CMA focus is limited to Google's SMS, AOP are confident that the industry would participate in and support the design for a transparency mechanism that enables clear visibility of the characterisation and categorisation of crawlers. With regard to 'Fair Payment For Content', and the proposal for this to be considered a Category 2 requirement, AOP, as with the PPA and others, are of the view that this position is not acceptable and that there is a need to develop Conduct Requirements to address fair payment now, not 12 months down the line, in parallel with the wider proposed Category 1 requirements.

AOP thank you for your commitment to driving this process.

### **About Association of Online Publishers**

Association of Online Publishers (AOP) is an industry body representing digital publishing companies that create original, branded, quality content. AOP champions the interests of media owners from diverse backgrounds including newspaper and magazine publishing, TV and radio broadcasting, and pure online media. For more information, please visit [www.ukaop.org](http://www.ukaop.org).

Association of Online Publishers  
Email: [info@ukaop.org](mailto:info@ukaop.org) Web: [ukaop.org](http://ukaop.org)