

25 February 2026

easyJet's response to the CMA's Consultation

Google's general search services: proposed Fair Ranking Conduct Requirement

General

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

easyJet supports the introduction of the Fair Ranking Conduct Requirement (CR). We agree that ranking should be based on objective, non-discriminatory criteria, and that businesses should receive greater transparency when material changes significantly affect visibility. We also support the inclusion of an effective complaints mechanism.

Clear principles and improved transparency would allow businesses to understand and respond to significant ranking impacts more effectively. This ultimately benefits consumers by improving the quality and reliability of results.

While we support the proposed CR, we encourage the CMA to re-evaluate whether the CR should also apply to paid content. From a consumer perspective, the distinction between paid and organic content has become less visually pronounced over time. At the same time, paid placements frequently occupy a substantial portion of the initial screen, particularly on mobile devices, reducing the visibility of organic results. We would welcome the CMA's consideration of whether the prominence and depth of paid placements are proportionate, whether clearer differentiation would enhance transparency, and whether applying the CR across the full search page would better support the CMA's objectives.

In summary, we support the proposed CR and its objectives. To ensure it fully delivers on fairness and transparency for users, the CMA may wish to consider whether equivalent principles should apply across both organic and paid search presentation.

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

We consider the proposal to meet the proportionality requirement under the DMCCA. It is targeted at the conduct in question and consistent with the DMCCA's objectives of promoting fair competition and benefits for consumers.

In the roadmap, we note the CMA's distinction between Category 1 measures, aimed at ensuring fair ranking and effective redress, and Category 2 measures concerning the treatment of specialised search services. In the context of flight search, we consider that properly implemented and robustly enforced fair ranking principles in category 1 are sufficient. If ranking is objective and supported by transparency and redress, concerns regarding self-preferencing can be addressed within this framework. A principles-based approach allows the CMA to address potential distortions without resorting to prescriptive, design-led remedies. In light of this, we would urge the CMA to allow an appropriate period of no less than 12 months following full implementation of the fair ranking conduct requirements to properly assess their impact before determining whether any Category 2 measures are required in this space. This is particularly important to avoid unintended consequences of the kind observed following the implementation of the DMA in the EU, notably in relation to self-preferencing. A measured approach would enable the CMA to evaluate whether robustly implemented and enforced Category 1 measures are sufficient to

address the relevant concerns before considering more intrusive, and potentially distortive, interventions.

Distinction from the EU Digital Markets Act

The DMCCA and the EU's DMA are distinct regimes. While there are similarities in policy objectives, the CMA retains discretion under the DMCCA, including the ability to assess proportionality and countervailing consumer benefits. This discretion is important and allows the UK regime to avoid automatic replication of approaches taken elsewhere.

Recent experience with the DMA demonstrates the need for caution. Changes introduced following DMA implementation have, in the context of flight search, resulted in unintended consequences affecting functionality, transparency and user experience. The UK framework should avoid outcomes that reduce product quality, by degrading filter functionality, or by making it more difficult for consumers to access accurate, real-time pricing and intuitive comparison tools.

Preserving High-Quality Flight Search Functionality

Flight search is particularly sensitive to design and data integrity. Airlines offer a time-specific and price-specific product. The ability for consumers to refine travel dates and compare flexible options is fundamental to meaningful comparison.

A critical enabler of this functionality is structured, permission-based data access via APIs. APIs allow reliable, high-volume exchange of real-time pricing and availability information, avoiding inaccuracies associated with outdated techniques such as screen scraping. Preserving this model supports transparency, consumer trust, and a high-quality user experience.

Restrictions that reduce access to real-time data or undermine this structured approach risk harming consumers and narrowing effective choice in the digital travel market.

We therefore encourage the CMA to focus on robust implementation of the Fair Ranking Conduct Requirement, supported where appropriate by clear interpretative guidance for flight search, rather than introducing separate, prescriptive Category 2 design remedies.

In our view, the Fair Ranking Conduct Requirement, properly applied and enforced, provides a proportionate and appropriate solution. For flight search specifically, Category 1 measures are sufficient, and no additional vertical-specific intervention is required.

Non-discriminatory and objective

Q6.4: Do you have any views on the non-discrimination part of the Fair Ranking CR?

(a) Are the requirements sufficiently comprehensive?

We consider the requirements to be sufficiently comprehensive and support, in particular, the inclusion of a clear non-discrimination requirement. We welcome the intention that the requirements ensure relevant decisions lead to search results that are non-discriminatory, objective, transparent and non-distortive.

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

N/A

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)

A "material change" should be defined by reference to impact. It should cover updates that are likely to have a significant and sustained effect on visibility, traffic, or discoverability.

This would include:

- Substantial changes to ranking policies;
- Major system-level updates, including core algorithm changes;
- Increases in the frequency, scope, or triggering of existing SERP (Search Engine Results Pages) features that materially affect user journeys, including features such as (but not limited to) AI Overviews, Directions, and Google Flights modules;
- Changes to the depth, styling, or prominence of paid results, including PPC ad formats, where these alter the balance between paid and organic visibility;
- Significant alterations to presentation, layout, or prominence that affect how results are displayed and accessed by users;
- Tests and experiments that are planned or launched where those experiments are reasonably likely to lead to changes in SERP presentation, layout, prominence, or traffic allocation, even if the outcomes are not yet final.

Crucially, materiality should not be limited to the introduction of wholly new features. Changes that expand or intensify the use of existing SERP features may have effects equivalent to new product launches and should not be excluded simply because the underlying feature already exists. Otherwise, there is a clear risk that impactful changes could proceed without appropriate scrutiny.

In the context of flight search, changes to the design or positioning of flight-related modules, or adjustments that materially affect traffic flows to airline or comparison sites, would clearly fall within this concept. The key principle should be whether stakeholders can take meaningful, actionable steps to adapt.

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

An impact-based definition of material change provides clarity and predictability, while also better aligning regulatory oversight with outcomes that matter to users. It reduces the scope for dispute over minor or technical adjustments and ensures attention is directed to changes that materially affect market behaviour and customer experience. This is particularly important in aviation, where changes in search visibility can translate rapidly into significant shifts in booking volumes and service availability for consumers.

We do not consider the proposed 30-business-day notice period to be sufficient. In our view, a notice period of six to twelve months would be more appropriate. This would give affected parties adequate time to understand the nature and likely impact of the change, and to plan and implement any necessary responses.

This extended notice period should apply not only to confirmed changes, but also to the launch of tests or experiments that are reasonably likely to lead to permanent changes in SERP presentation, ranking, or traffic allocation. Even where outcomes are not yet final, such experimentation can have immediate commercial effects and may signal longer-term shifts that businesses need to prepare for.

This is particularly important for material changes affecting high-value verticals such as flight search, where changes to SERP presentation, prominence, or traffic allocation can have significant and wide-ranging implications for market participants. Responding effectively to such changes often requires strategic assessment, internal governance processes, and alignment with established planning and budgeting cycles, which typically operate over multi-quarter or annual timeframes.

Absent of sufficient advance notice, affected parties may be unable to engage meaningfully with the change or to respond in a considered and proportionate way. This risks undermining predictability and effective competition, with potential adverse consequences for innovation and consumer outcomes. A longer notice period would therefore better support transparency, enable informed adaptation, and align with the objective of maintaining fair and well-functioning markets.

Recent experience under the DMA demonstrates that design and ranking changes can result in significant and rapid traffic impacts. In sectors such as aviation, these shifts are not only commercially material but can also have downstream effects on consumers, including reduced visibility of alternative offers and diminished comparability. Overall, enhanced transparency around material changes would improve market stability, support informed adaptation, and strengthen user trust in search outcomes.

Non-distortion and complaints

Q6.6: Do you have views on the non-distortion and complaints part of the Fair Ranking CR (a) What are your views on our proposed complaints-led process?

We are supportive of the proposal.

Q6.6(b): What factors should inform whether the materiality threshold has been reached?

Materiality should be assessed based on sustained commercial impact. Relevant factors include significant and persistent traffic or visibility loss, divergence from objective ranking criteria where supplier content is systematically disadvantaged.

Also, noting our view that paid results should be in scope of the CR, materiality should consider excessive paid ad depth that systematically marginalises organic listings. Ensuring appropriate PPC depth relative to organic impact would prevent crowding out of supplier content.

Q6.7: Do you have views on our proposals for introducing a general complaints process covering manual exclusions from Google's search index?

N/A