

MoneySuperMarket's Response to the CMA Google Consultation

Executive Summary

MoneySuperMarket is a price comparison website (PCW) operating in the insurance, energy and household services markets in the United Kingdom. We serve millions of consumers annually, helping them access competitive prices and save money. Google Search is a critical channel through which consumers find us and are therefore supported to save significant amounts of money. The fairness and transparency of Google's organic ranking practices has a direct and material impact on our business, the wider markets in which we operate and crucially our consumers. We believe we are one of Google's biggest partners in the UK.

Overall, we welcome the CMA's proposed Fair Ranking Conduct Requirement (CR). We note that, in proceedings brought by the US Department of Justice (DoJ) on behalf of federal and state governments, the US District Court for the District of Columbia found on 5 August 2024, that Google had acted illegally to maintain its monopoly position in the markets for 'general search services' and 'general search text advertising' in the US.

While we strongly support the Fair Ranking CR's introduction, it is our view that it requires strengthening to fully address broader issues around transparency. As a PCW operating in a highly competitive consumer market, we have direct experience of the importance of transparent, predictable and fair ranking practices. The way that Google's search model now works is to give overwhelming prominence to paid-for content, which does not clearly show users that this is paid-for content, and does not offer businesses sufficient transparency regarding what they are paying for and how the ranking will work, resulting in Google holding the power rather than the consumer. Furthermore, the relationship between organic and paid Google results and AI Overviews is now so strong that we propose they shouldn't be considered in isolation. High levels of uncertainty in ranking practices in organic results and AI Overviews, combined with increasingly low prominence of organic results, leaves businesses with limited alternatives other than to engage in paid-for content.

Our responses to the specific consultation questions are set out below.

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

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We agree with a large portion of the proposed scope for organic search, and in particular, we support the CMA's decision to include ranking within search generative AI (gen-AI) features as well as traditional organic web results. This is essential future-proofing: as AI-generated responses increasingly displace traditional website results, any CR that omits them would rapidly become ineffective.

As a PCW, our priority is to ensure consumers are able to access competitive and transparent product offerings across a range of household bills, products and services, including insurance and energy - markets where consumers stand to make significant savings through effective comparison.

There are therefore two areas for consideration where the scope could be strengthened:

1. The exclusion of paid-for content from the scope of the CR creates a risk of circumvention and fails to properly address a number of issues in the current search engine ranking model. While we understand the CMA's rationale, we would encourage the CMA to consider all search listings. Firstly, the distinction between organic and paid results is increasingly blurred for users, and there is a real risk that Google could shift conduct into the paid environment to avoid obligations in the organic one. Secondly, we are increasingly concerned over the paid-for content environment and the potential risk to consumers. Google currently exercises unilateral control over the pricing of its search advertising, with limited transparency regarding the cost to participate for businesses or how this shapes the final consumer search experience. The CMA states: " In the UK, Google accounts for more than 90% of all general search queries." [\[Link\]](#) We believe it is essential that the new conduct requirements restore absolute trust and transparency in all search ranking and the commercial systems behind them.
2. The scope must robustly and explicitly cover AI Overviews, AI Mode and any future Gemini-powered features embedded within general search. We welcome the CMA's inclusion of search gen-AI features within the CR's scope, but we consider this needs to go further. As AI Overviews and Gemini-powered features become a primary means by which users receive information from Google, the question of how Google selects what content to surface within those features becomes critical, particularly ahead of any potential monetisation of gen-AI. The CR must make clear that the non-discrimination and transparency obligations apply fully to how Google selects, ranks, and presents publisher content within AI-generated features, and that these features cannot be used as a vehicle to circumvent the obligations that

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apply to traditional organic results. This is important in enabling consumers to not receive a partial AI-generated summary, but be able to make significant savings through effective and transparent comparison.

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

We consider the potential benefits of the Fair Ranking CR to be significant when it comes to organic content. For PCWs the biggest benefit is trust in the search ecosystem. It is vital that PCW customers can discover our services via Google search based on the objective quality and relevance of our tools. Currently, there is significant uncertainty regarding the criteria Google uses to rank results. This creates an environment where 'visibility' is something that must be bought, rather than earned through service quality, ultimately limiting the growth of the organic search ecosystem. While we are supportive of the need for paid-for content, we need to ensure there is more transparency about what businesses are paying for and how the ranking will work, so that the power is in the hands of consumers rather than Google.

PCWs play a key role in driving competition in a variety of markets by making it easier for consumers to compare and switch. In 2025 alone, MoneySuperMarket helped the nation save over a billion pounds on their household bills, demonstrating the impact that price comparison websites have on consumer finances, when consumers are able to clearly and transparently find the right information and be supported in finding the best deals for them. The CR would have significant indirect benefits for consumers by driving a level playing field, particularly in markets such as car insurance and energy where comparison is a key driver of price competition.

However, by not addressing the issues with paid-for content, and allowing Google's Search function to be based on which business is paying the most rather than which is receiving the most clicks or delivering the best results, the costs will be felt by consumers, who will not be able to reap the benefits of transparency, choice and open competition.

We do not consider the costs of the CR to be significant relative to these benefits. The core obligations reflect practices that Google already publicly commits to under its Honest Results Policy. We note that the CMA estimates total costs to Google of up to £15 million over five years, compared with the estimated £20 billion Google generates in UK search advertising revenue annually.

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[MoneySuperMarket](#), part of the MONY Group of trusted consumer brands, is the UK's most recommended price comparison service. We're a loudspeaker for consumers trying to make the right choices about their money. We help millions of people save hundreds of millions of pounds on their bills, across all forms of spending, from utilities, mortgages, and insurance, to credit cards and broadband and we have over 2 million SuperSaveClub members.

As part of our efforts to understand and support people with their everyday costs, we launched our [MoneySuperMarket Household Money Index](#) in 2023 - a quarterly barometer of people's daily spending across the country. It tracks how families and individuals are spending and saving across a wide range of different costs and essentials such as rent, mortgages, and energy bills. Since 2024, we have published reports on the links between money worries and mental health via our '[Money Talks](#)' partnership with the Campaign Against Living Miserably (CALM), and have launched an online financial wellbeing hub to spotlight the issues around financial wellbeing.

MoneySuperMarket is FCA-regulated, Ofcom-accredited, and Ofgem-accredited. We won the Feefo Platinum Trusted Service Award 2024 for outstanding customer service, and we're the UK's most-recommended PCW.

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