

Subject: CMA consultation – AI-mediated search, transparency, steering risk, and meaningful choice

I am a compliance professional working in financial services, and an independent researcher in relation to AI governance¹. I support the CMA's proposed conduct requirements for Google Search and encourage the CMA to treat AI-mediated search features (including AI Overviews and summarisation layers) as a high-priority competition and consumer transparency risk.

Search is increasingly mediated not only through ranked links, but through AI-generated synthesis. This shifts the locus of influence from “what results appear” to “what narrative the user is given,” including *what is omitted*. In such systems, commercial incentives could shape outcomes without requiring a clearly labelled advertisement, through influence of reasoning and promotion of commercial interests in a way that is opaque to the user.

Key concern: steering without explicit ads

Traditional advertising disclosure assumes a visible boundary between paid placement and organic relevance. “AI synthesis” blurs this boundary: commercial weighting can manifest as subtle framing effects, selective citation, and confidence signalling. The user may perceive a single authoritative answer, even where underlying sources are disputed.

Recommended focus areas for conduct requirements are therefore:

1. Transparency: Users should be able to understand when AI synthesis is being used, what sources it relied on, and whether commercial arrangements affected selection or ranking.
2. Choice and control: Users should be able to disable AI synthesis features without being materially degraded in service quality.
3. Publisher fairness: Publishers should have meaningful options to manage AI-mediated reuse and summarisation of their content without punitive delisting or loss of discoverability.
4. Auditability: The CMA should ensure enforceable logging requirements so that outputs can be investigated retrospectively in cases of suspected bias or unfair commercial influence.
5. Preventing exploitative defaults: Default settings should not push users into AI synthesis experiences that obscure the difference between true summarization and subtly subverted output.

If AI-mediated search becomes the primary consumer interface, then **transparency and choice obligations must extend beyond traditional ad labelling**. Otherwise, steering effects could persist while remaining formally outside existing disclosure categories.

Thank you for your consideration of this point of view.

Jim Hales, 8 February 2026

¹ Publication: <https://doi.org/10.5281/zenodo.18371018>