



Google's general search services: proposed conduct requirements

25th February 2026

A sustainable future for public interest journalism

The following document sets out the response of the Public Interest News Foundation (PINF) to the CMA's proposed conduct requirements in relation to Google's general search services.

PINF is a charity which promotes public interest news. We do not promote the commercial or political interests of particular news providers. We believe that citizens and consumers benefit from a sustainable, plural and innovative news industry.

We are responding to the CMA's consultation because we believe that there should be no delay to redressing the balance between Google and the news industry, thereby decreasing Google's dominance, restoring a sustainable, plural and innovative news industry, and ensuring the interests of citizens and consumers.

Without publisher conduct requirement, trustworthy news will diminish

We welcome the CMA's proposed conduct requirements in relation to Google's general search services. In particular, we strongly agree with the draft publisher conduct requirement's identification of the potentially catastrophic results for audiences, given that publishers cannot currently withdraw their content from use in Google's AI overviews without being de-ranked in Google search.

We have known for some time that AI overviews in search run the risk of cannibalising news content online, so the conduct requirement is a desperately needed first step. If publishers can't sustain their businesses, due to rapidly decreasing traffic to their sites, there will be less and less trustworthy content to draw on, with misinformation filling the gaps and dominating the information environment, causing further tension and even violence within our communities.

The IPPR's recent report *AI's got news for you* found that publishers are predicting a 43 per cent reduction in search traffic over the next three years, as AI overviews in search reduce the likelihood that users will click through to news sites.¹ This seriously threatens already dwindling advertising and subscription revenues as AI tools nearly always reproduce news content without payment.

It also finds a total lack of transparency in how AI tools select their source material, with some news outlets prioritised over others, creating a new generation of winners and losers, and potentially amplifying particular viewpoints or agendas without users' knowledge. Local news outlets are already under extreme pressure, meaning that they are particularly vulnerable to the financial impacts threatened by the rise of AI tools.

Delay undermines the purpose of the DMCC act

We would also like to take the opportunity to express our significant concern around the CMA's announcement delaying the next set of conduct requirements. Local news publishers and the communities they serve cannot wait - they need action to be taken now.

The Digital Markets, Competition and Consumers Act was created with the intention, among others, of rebalancing the relationship between publishers and online platforms. This key purpose of legislation cannot be delayed, especially as a timeline has already been set out for its implementation.

Furman and Cairncross Reviews

The history of the Act makes it very clear that rebalancing the platform-publisher relationship is a core intention. Beginning in 2019, the Furman Review called for the creation of a mandatory '**code of conduct so the largest digital companies know the competitive rules of the game.**'² The review highlighted that existing competition rules were inadequate to prevent '**bullying tactics by market leaders,**' emphasising the need for new mechanisms ensuring fair dealing.

Market failure in public interest news was first identified in the 2019 Cairncross Review, which recommended a new regulatory code to rebalance the severe '**uneven balance of power**' between platforms and publishers. The review warned that the imbalance of power '**eroded revenue**' for public-interest journalism and strengthened platforms' ability to control distribution without compensating publishers fairly, calling for government action to be taken.

The Government's own intentions

¹ See: <https://www.ippr.org/articles/ais-got-news-for-you>

² See: <https://www.gov.uk/government/news/tech-giants-do-not-face-enough-competition-reducing-consumer-choice-and-innovation>

The Government's response to these reviews formally acknowledged these concerns regarding the imbalance of power and signalled political recognition that platform conduct rules were required.³ The House of Lords debate on the Cairncross review emphasised the '**huge power of online platforms**' and the '**asymmetry of power**' between platforms and publishers, urging reforms to prevent platforms from degrading news quality and controlling revenue flows.⁴

During the passage of the bill, the Government was clear that redressing the balance between the tech giant and UK news organisations was central to the intention of the Act, with the Parliamentary Under-Secretary of State for Science, Innovation and Technology remarking that 'we recognise the traditional business model of news media, particularly print media, which has been substantially disrupted by the growth of digital. **The regime is designed to help rebalance the relationship between major platforms and those who rely on them, including news publishers.** That could include creating an obligation to offer fair and reasonable payment terms for the use or acquisition of digital, including news, content.'⁵

The Parliamentary Under-Secretary of State for Science, Innovation and Technology also remarked that 'it is important that **news publishers can benefit from the robust protections** offered by the new regime'⁶ and that 'the Digital Markets, Competition and Consumers Act **will help rebalance the relationship between news publishers and dominant online platforms**, which has been at the root of many challenges the industry has faced in recent years.'⁷

Reasonable expectations

The DMCC Act embedded enforceable conduct requirements for firms designated with Strategic Market Status (SMS), including 'fair dealing,' 'open choices,' and 'trust and transparency,' directly addressing the concerns raised and empowering the CMA to require platforms to treat news publishers on fair, reasonable and non-discriminatory terms.

The Roadmap published in July 2025 said that the regulator would consider fair and reasonable terms in relation to publisher content in the first half of 2026. The proposal identified that Google's bargaining position can impact fair and reasonable terms for

³ See: <https://www.gov.uk/government/publications/the-cairncross-review-a-sustainable-future-for-journalism/government-response-to-the-cairncross-review-a-sustainable-future-for-journalism>

⁴ See: <https://hansard.parliament.uk/Lords/2020-02-06/debates/F5784CA3-5BFD-4F46-83B2-2135F895B824/CairncrossReview>

⁵ See: <https://hansard.parliament.uk/commons/2023-11-20/debates/FE9BD599-94F0-413A-8F4E-F1F206DBD761/DigitalMarketsCompetitionAndConsumersBill#>

⁶ See: [https://hansard.parliament.uk/commons/2023-06-20/debates/e49acf0a-4416-4080-8626-ae65a418d198/DigitalMarketsCompetitionAndConsumersBill\(FifthSitting\)](https://hansard.parliament.uk/commons/2023-06-20/debates/e49acf0a-4416-4080-8626-ae65a418d198/DigitalMarketsCompetitionAndConsumersBill(FifthSitting))

⁷ See: [https://hansard.parliament.uk/Lords/2025-04-25/debates/90637C6B-9016-4872-AC00-2861E827C20D/TheFutureOfNews\(CommunicationsAndDigitalCommitteeReport\)](https://hansard.parliament.uk/Lords/2025-04-25/debates/90637C6B-9016-4872-AC00-2861E827C20D/TheFutureOfNews(CommunicationsAndDigitalCommitteeReport))

publishers - including fair payment terms for the use of their content and insufficient controls about how content is used in Search and AI overviews - limiting publishers' ability to monetise their content.

PINF responded, supported by a group of 27 independent local news publishers, by urging the CMA to move more quickly with this conduct requirement.

The sector has a legitimate expectation based on these public statements made by government officials, experts appointed by government and in the CMA's own publications that these conduct requirements would be introduced at the earliest opportunity.

We therefore implore the CMA to reconsider and recommit to its original timeline. We have no evidence to suggest that Google will comply expediently with the spirit of the legislation without being compelled to come to the negotiating table. Based on proceedings in other markets, it seems likely that it will take a long time for effects of the non-payment terms to play out in full.

Big tech profits as local news diminishes

PINF's local news map, a comprehensive picture of local news provision across the UK, shows that 4.4 million people are living in news deserts in the UK with no access to relevant, timely and local information that they can trust.⁸ This is because the local news market has been completely corrupted by big tech power.

Our 2025 research, conducted by FehrAdvice, investigating the true value of news to Google, showed that Google generates £5.6 billion a year with the help of news media content, almost none of which is shared with the publishers who create the content.⁹

The big tech firm needs news to provide the trustworthy information that keeps users returning to its search engine. Yet we observed evidence of a broken system. 4 in 10 users stay within the Google ecosystem after searching for something, rather than clicking through to news media. Two thirds of users (67 per cent) stop reading after the headline, having gathered the news they were looking for in their information search.

Google is creating negligible amounts of additional traffic to news sites, contrary to its oft-repeated claim, and news providers are stuck. They need to have appealing headlines to get to the top of Google's search algorithm, but these headlines are so good that people don't need to click through to the website. Google's new AI tool is compounding this problem, as the CMA correctly surmises, amalgamating news stories for users at the top of the search page to provide answers without even having to scroll.

⁸ See: <https://storage.ghost.io/c/27/ee/27ee876d-8f09-407d-8f7d-d7506b4bb036/content/files/2025/12/PINF-Local-News-Report-2025--8-December-.pdf>

⁹ See: <https://www.publicinterestnews.org.uk/blog/2-2-billion-the-value-of-news-to-google-in-the-uk/>

The search engine is clearly dominant in an uncompetitive market. But, Google search is valuable because users are granted access to a wide range of news content, from both large news brands and small, independent news providers.

Google generated £16.7 billion from search advertising in the UK in 2023 (IAB Europe, 2022),¹⁰ of which 55 per cent, £8.5 billion, comes from information searches (Höppner & Piepenbrock, 2022).¹¹ News adds value to information searches 66 per cent of the time, meaning that Google generates £5.6 billion with the help of news media content.

If this value was split 60:40 with Google, then news providers as a whole would be entitled to a revenue share of £2.2bn – for 2023 alone (Johann et al., 2023).¹²

While large US-based companies like Google are enabled to continue their rapid growth at the expense of British consumers, local news publishers are having to find new business models in the wake of big tech disruption. In contrast, given the number of jobs that have been lost and newsrooms that have closed in recent decades, there is enormous room for growth in the local news sector that would greatly enrich the UK economy. Local news outlets drive regional growth by creating jobs, investing locally and promoting local businesses.

Local journalism both encourages those living in the local area to participate in their local economy and attracts new visitors to an area by making it more visible.¹³ Social Streets found that more than half of their readers had been encouraged to visit a local shop, bar or restaurant as a result of their content.¹⁴ PINF research in 2025 showed 55% of readers agreed that they supported local businesses more as a result of reading local news.¹⁵

Ensuring fair value exchange for the benefit of all communities

We strongly believe that the approach set out in the Act and followed by the CMA will lead to a fair and sustainable value exchange between actors that all communities can benefit from, but the regime must be not delayed.

We would be delighted to provide further information on any of the points raised in this response and we look forward to following this process closely.

¹⁰ IAB Europe (2022) AdEx Benchmark 2021 Report, p 43.

¹¹ Höppner & Piepenbrock (2022) Digitale Werbung und das Google Ökosystem p 264.

¹² Johann et al. (2023) The value of journalistic content for the Google search engine in Switzerland pp 38-40.

¹³ Social Streets, 2020, *The Social Value of Local Journalism*, p. 21.

¹⁴ *Ibid.* p. 20

¹⁵ PINF, 2025, Survey of Indie News Audiences, p. 3. Accessible: <https://www.publicinterestnews.org.uk/index/>