

Response to CMA Consultation on Proposed Google Publisher Conduct Requirements (February 2026)

About the Publishers Association

- The Publishers Association is the membership organisation for the UK's world-leading publishing industry, spanning consumer, academic and education publishing. Our members produce digital, print and audio books, research journals and educational resources. UK publishing is worth £11 billion to the UK economy, supporting 84,000 jobs and £4.4 billion in exports.
- Publishers embrace AI in their operations and perform a crucial role in underpinning AI development in the UK, both as AI innovators in their own right and as the curators of the high-quality content that AI developers need to use to create trusted and reliable AI models.

Key points – impacts on publishers

- **In summary, the Publishers Association broadly supports the Competition and Markets Authority's (CMA) proposed approach to Publisher Conduct Requirements.** We agree with the CMA's theory of harm and commend the recognition that the 'balance has shifted' in respect to Google Search. Publishers are experiencing a decline in referrals back to their websites and have limited visibility as to how their content is being used in Google's generative AI features, such as AI Overviews.¹ We welcome the CMA's ambitions to grant publishers greater control, transparency and attribution in respect to the use of their content. We also support the high-level aims pertaining to crawlers, namely that Google should provide transparency to publishers about how it uses crawled content for AI and on exactly what its various publisher controls cover in practice. As we explain, action on Google is necessary in order to generate significant consumer benefits - a central objective of the CMA's Draft Annual Plan for 2026-2027.
- **Publishers report that Google's general Search services are resulting in negative impacts on their online traffic.** They observe declining click-through rates, reduced attribution and decreasing revenue. For instance, Oxford University Press notes that the advent of Google's AI Overviews has resulted in a 19% decline in click-through rates to academic reference services.² This is likely to be as a result of Google's conduct in its Search services and AI features. Another publisher, of academic journals, observes that 'click-through rates are plummeting across the web, so really the most plausible explanation is changes to Google's Search Engine Results Page (SERP)'. The problem, and its sheer scale, undermines the significant investments that publishers make in commissioning, curating and disseminating high-quality and trusted content. Google's approach to Search is also detrimental to publishers in demonstrating their value to various customer audiences, such as academic institutions, society partners and licensees.
- **We are concerned that the failure to hold Google to account in this space could pose unintended consequences, including risks to the investments that publishers make in research integrity and trusted information.** Publishers uphold the quality, integrity and accuracy of content in a range of ways. For example, academic publishers support researchers to validate results, present them effectively, share findings among readers and communicate them to the

¹ '[Responding to the Threat of Zero-Click Search and AI Summaries: How Do We Tame The Crocodile?](#)' (The Scholarly Kitchen, February 2026).

² '[AI search summaries cannibalise academic publishers' web traffic](#)' (Times Higher Education, March 2025).

wider world. They coordinate robust peer review programmes, overseeing quality control and checking for plagiarism. They help to maintain an accurate scholarly record, ensuring long-term trust and use in outputs. The work of publishers therefore helps to deliver on the CMA's focus on delivering benefits to consumers: at a time when pressures on research integrity are more pertinent than ever, our members make substantial investments to mitigate against mis/disinformation and ensure high-quality, accurate and trusted content reaches the public for the benefit of society. In short, failure to take action on Google in respect to Search could result in less investments in research integrity.

- **Another unintended consequence is the risk to publishers' growth and contribution to the UK economy.** The Publishers Association has been a vocal supporter of the Digital Markets, Competition and Consumers Act as it is a strong signal of support by the government of the need for fair digital markets. We also welcome the CMA's messaging on the need to support the 8 Industrial Strategy sectors – which includes the creative industries and therefore publishing - to grow. Independent analysis by Public First suggests that, with the right policy conditions in place, publishing has the potential to contribute an additional £5.6 billion to the UK economy by 2033 and support a further 43,000 jobs. The fact of Google's general Search services having a materially adverse effect on publishers' revenues undermines the sector at a time when our members are trying to grow. There is no doubt that this economic potential is part of the government's broad ambitions too.

Our asks of the CMA

While we largely support the CMA's proposals, we ask that it:

- **Goes further in its ambitions on crawlers, by mandating complete decoupling of Google's crawlers for Search/ranking from its crawlers for AI purposes,** including AI Overviews. Crawler separation would help to deliver on the CMA's stated aims of attribution and transparency. It would also likely pose a 'win-win' for Google and for publishers: separate crawlers would enable publishers to understand which parts of their content are being used by Google in response to certain questions, which would in turn assist publishers to produce content that is useful to Google Search.
- **Presses ahead with its intentions to impose robust transparency obligations on Google.** We encourage the CMA to mandate disclosure to publishers about how Google's AI features work, as well as to provide metrics to publishers pertaining to the performance of their content on the platform. In practice, transparency should include: distinction between traditional organic search traffic and AI-generated results traffic; reporting on AI Overviews and AI Mode impressions and click-through rates; and clear visibility on content usage. We also want Google to disclose what it has scraped to date.
- **Adopts a swifter timetable for the Conduct Requirements to come into effect.** Given the scale of the problem, we ask that the CMA acts as quickly as possible to analyse the consultation responses, finalise the Conduct Requirements and bring them into effect. The proposed six-month grace period risks a delay to the relief that publishers might otherwise enjoy. It is important to note how rapidly AI products are developing and affecting publishers' businesses. Also on timings, it is disappointing that the CMA is pushing back a second consultation on Google Conduct Requirements (about payments to publishers) to 2027, rather than holding it in 2026 as planned.
- **Promotes international alignment in a bid to avoid potential for loopholes on the use of UK content in foreign jurisdictions.** We can foresee a risk where content scraped from UK publishers

is used to support Search or for AI purposes in other markets. Taking into account the widespread influence of UK content, especially in overseas English-language markets, we are concerned that the Conduct Requirements could be exploited by Google's operations overseas. The CMA should strive for greater clarity on territorial application of the Conduct Requirements, as well as engage with policymakers abroad to promote the benefits of alignment in the approach to Google.

- **Treats this as a digital competition issue, not a copyright issue.** There is a live policy debate about the future of the copyright regime in respect to AI. We encourage the CMA to avoid using ongoing copyright discussions as a reason not to take action on Search services.

Conclusion

The Publishers Association welcomes the opportunity to respond to this consultation. We encourage the CMA to consider the points in this submission. This consultation, and the CMA's ensuing decisions on next steps to take, could potentially help to position the UK's digital competition regime as world-leading, pro-competition and pro-growth.