

## **Redbrain Ltd**

Consultation Response — Fair Ranking Conduct Requirements

February 2026

Thank you for the opportunity to participate in the CMA's roundtables and to provide written feedback on the proposed conduct requirements for Google's general search services.

Redbrain is a UK-based comparison shopping service. We operate properties that depend on both organic and commercial search visibility and participate in Google's Shopping Units.

We broadly support the CMA's approach to fair ranking. Our comments below focus on the proposed conduct requirement and some observations on product search.

### **Fair ranking conduct requirement**

We agree with the CMA's finding that information asymmetry between Google and market participants can undermine trust and affect business investment decisions.

We would highlight four areas where the proposed framework could be strengthened.

#### **Burden of proof.**

The conduct requirement should make clear that Google must demonstrate compliance. If affected businesses must instead prove a breach, enforcement becomes difficult because the relevant data and systems are controlled by Google.

#### **Presentation changes.**

Changes to the design and placement of features such as AI Overviews, Shopping Units, or product carousels can redirect user traffic as effectively as ranking adjustments. The governance framework should therefore capture significant presentation changes as well as algorithmic updates.

#### **Complaints mechanisms.**

The existing complaints process available to businesses does not provide sufficient clarity or accountability. At a minimum, an effective process would require time-bound responses, clear reasoning linked to specific policies, and a defined escalation route.

## **Commercial relationships.**

The conduct requirement should ensure that commercial arrangements do not influence ranking outcomes. This includes advertising relationships, content-use agreements, or participation in vertically integrated services.

## **Product search and category two work**

We note the CMA's intention to examine product search and related vertical issues separately and support a structured approach to this work.

From our perspective as a comparison shopping service, the boundary between organic ranking and commercial product features is not always clear. The design and presentation of product-related interfaces—such as Shopping Units or product carousels—can significantly influence traffic allocation. It will therefore be important that any future framework considers both ranking behaviour and the role of interface design in determining visibility.

We also note that the product search remedy proposal currently available to stakeholders is primarily presented through interface mock-ups and high-level descriptions. For a non-discriminatory framework to function effectively, it will be important that key operational aspects are clearly defined. This includes the principles governing provider selection, how visibility is allocated among eligible participants, and how monetisation interacts with those mechanisms.

## **Closing**

We appreciate the CMA's engagement and the opportunity to contribute to this consultation. We would be happy to provide further input if helpful as the work progresses.