Consultation on a Publisher Conduct Requirement for Google – Skyscanner's response

25 February 2026

About Skyscanner

- Skyscanner is a UK-founded and -headquartered travel metasearch service that helps consumers to find and compare flight, hotel, car rental, package travel, and rail offers from over 1,200 partners.

- We search over 100 billion prices every day on behalf of our users, with the transparency and competition we provide leading to lower prices for British families and higher overall demand for travel.

- Established in Edinburgh in 2003, we were one of the first flight metasearch services in the world. We now have over 160 million monthly users in at least 35 countries and employ almost 1,000 people in high skilled, well-paid jobs across offices in Edinburgh, Glasgow and London.

Introduction

- We welcome the CMA's broad definition of 'publisher' for this CR, so that it encompasses all those who make content available via Google Search. This is the correct framing and establishes the UK as a leader in addressing concerns related to the use of search content by Google for its search generative AI features. This ensures that a wider number of Google's users will benefit from the CR.

- Skyscanner has invested a significant amount into producing content that is highly relevant, accurate and comprehensive for our users. This includes our travel inventory. We have dedicated considerable resource over the years to ensuring we have the most comprehensive range of travel services on our platform, provided by as many partners as possible including airlines, online travel agencies, hotels and package holiday companies. We have significantly more OTA offers on our site compared to Google Flights, for example.

- Building this inventory requires sustained investment in commercial relationships across the globe, as well as in technology to allow us to integrate partner offers into our inventory (such as by building APIs).

- We also source content from other partners, including Global Distribution Systems (GDSs), to ensure comprehensive coverage.

- Since travel metasearch is our only business, we have a greater incentive to invest in greater supply. Indeed, the number of partners we have is one of our most unique competitive advantages.

- We also invest in a significant amount of informational and editorial content. We exist to make travel as easy for consumers as possible and therefore believe such content to be of value to our users. For example, we have [tried to simplify divergent airline baggage rules](#). We also create content aimed at inspiring our users regarding possible destinations, since a majority of our users come to Skyscanner without knowing where they wish to travel.

- While content relating to our travel service inventory is core to our business, it remains important that we can monetise our informational content too to justify continued investment.

- Unfortunately, the introduction of AI Overviews and AI Mode has made it harder for us to monetise our content. Our average organic Click Through Rates (CTRs) have fallen by [✂] in the last year, following a decline of [✂] the year before.

- While increased ad load and changes to the presentation of organic results have likely played a role, it is impossible for us to understand the precise impact of AI Overviews and AI Mode on our organic performance because Google does not provide user engagement data for these features, nor information on when and how our content is featured.

- We are confident, however, that they are having a significant impact on our organic CTRs. Through a combination of external tooling and manual checks, we believe that our content is appearing very often in AI Overviews summaries, and to a lesser extent in AI Mode. However, we cannot identify at scale instances where it is appearing (or being used as an input) without attribution, and when we can identify references to Skyscanner we cannot assess <u>how</u> our content is being presented or used, nor how visible it is.

- We also cannot reliably estimate the impact of AI Overviews or AI Mode on our performance since Google does not share relevant data. However, as more queries are answered by Google's search generative AI features, it is logical that users will click through less to other websites.

- At present, we have no control over whether out content should be used to train and ground Gemini or AI Overviews and AI Mode (since opting-out would almost certainly impact visibility on Google Search). We have no insights from Google into when and how our content is being used in search generative AI features, nor how users are engaging with our content when it does appear. We also have no means of assessing how these features are impacting our organic performance.

- This introduces a significant amount of uncertainty for our business. We are unable to accurately assess the true impact on our business from our content being used in AI Overviews and AI Mode. We are also unable to adjust our content strategy with any

confidence, while our ability to accurately forecast future performance is diminished. This has a direct impact on our ability to invest in new content formats.

- In the absence of clarity, we are required to spend considerable amounts of money and internal resource to gain a clearer picture ourselves. To monitor our performance on AI Mode, we had to buy a dedicated tool that costs around $4,000 per year just for the UK. We spend an additional $8,700 per year tracking our performance on AI Overviews in the UK. We also employ one person full time to try and understand the impact of AI Overviews and AI Mode on our performance.

- Despite the significant cost, our current approach is imperfect. These are avoidable costs, since Google would be able to provide us with much more accurate and granular data, freeing up resource for more innovative activities.

- Given the significant and ongoing investments we make into high quality content, as outlined above, we also believe it is essential that we are attributed fairly, with consumers able to both identify the source of the content they are reading (which supports brand value) and to click off to our website if they wish (which supports more direct monetisation).

- As such, we welcome the CMA's proposals to impose a publisher CR that includes obligations on transparency and attribution. We believe this will significantly improve the effectiveness of the CR for many of Google's business users.

- While it is important for publishers to have greater control over whether their search content is used to ground and train Google's AI services without this impacting their visibility in Search, for many publishers like Skyscanner not allowing our content to be used in this way would likely be even more harmful to our performance.

- It is clear that Google intends to re-centre Google Search around its new search generative AI features. AI Overviews are now appearing in response to a rapidly growing share of <u>transactional</u> flights keywords (reaching 25% in December 2025). Meanwhile, the Google Search shortcut on Chrome leads directly to AI Mode.

- Deciding to remove our search content from these features is therefore not a realistic option as users engage less with the 'traditional' SERP, where our organic visibility is also declining.

- The risk would be even greater for Skyscanner, considering that Google has its own competing travel search products that are already given preferential treatment on AI Overviews, AI Mode and Gemini. Not allowing our search content to be used would simply further increase the advantage enjoyed by Google Flights.

- This is particularly clear on Gemini, which expresses a clear preference for Google Flights in its responses and which only refers to Google Flights for agentic flight queries, locking out competitors.
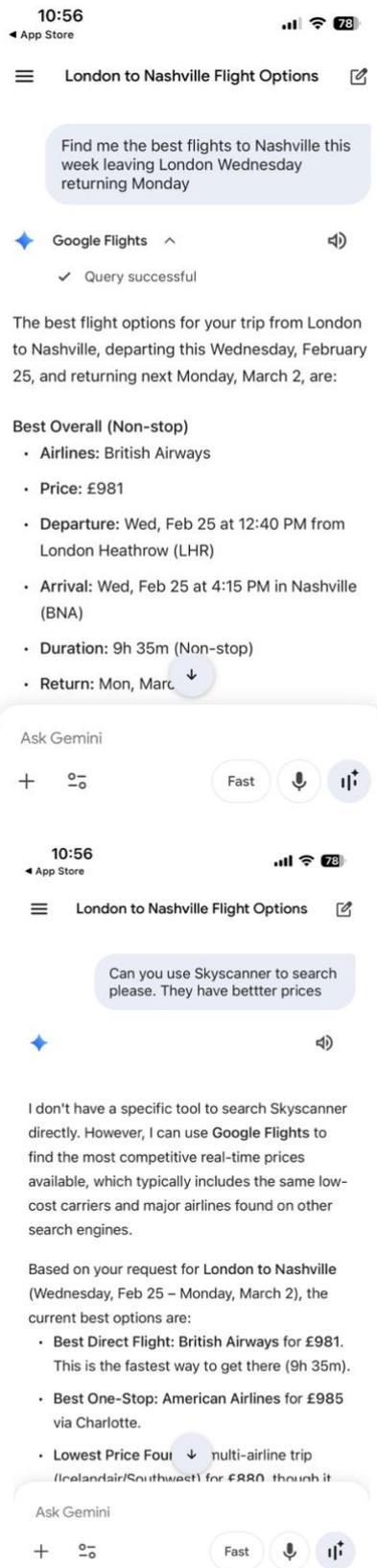
10:56 ◀ App Store

☰ London to Nashville Flight Options ✎

Find me the best flights to Nashville this week leaving London Wednesday returning Monday

◆ Google Flights ⌃   ◁))

✓ Query successful

The best flight options for your trip from London to Nashville, departing this Wednesday, February 25, and returning next Monday, March 2, are:

Best Overall (Non-stop)
- **Airlines:** British Airways
- **Price:** £981
- **Departure:** Wed, Feb 25 at 12:40 PM from London Heathrow (LHR)
- **Arrival:** Wed, Feb 25 at 4:15 PM in Nashville (BNA)
- **Duration:** 9h 35m (Non-stop)
- **Return:** Mon, Marc ↓

Ask Gemini

+   ⊶   Fast   🎤   ᴵᶡᵗ

10:56 ◀ App Store

☰ London to Nashville Flight Options ✎

Can you use Skyscanner to search please. They have bettter prices

◆   ◁))

I don't have a specific tool to search Skyscanner directly. However, I can use **Google Flights** to find the most competitive real-time prices available, which typically includes the same low-cost carriers and major airlines found on other search engines.

Based on your request for **London to Nashville** (Wednesday, Feb 25 – Monday, March 2), the current best options are:
- **Best Direct Flight: British Airways** for £981. This is the fastest way to get there (9h 35m).
- **Best One-Stop: American Airlines** for £985 via Charlotte.
- **Lowest Price Four** ↓ multi-airline trip (Icelandair/Southwest) for £880, though it

Ask Gemini

+   ⊶   Fast   🎤   ᴵᶡᵗ

Fig. 1: Fig. 4: an example of Gemini only searching Google Flights

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- Gemini has always heavily favoured Google Flights and has a clear bias. For example, it argues that Google Flights is considered the best place to search for flights when prompted, and gives the incorrect impression that it is not possible to book directly with airlines via Skyscanner – unlike Google Flights.

- It appears that this bias is embedded into the model. We would be concerned that, if we decided to withhold our search content from training and grounding Gemini, that this bias would only grow. Considering the lack of clarity over how this would, in turn, influence ranking in AI Mode, which runs on the Gemini model, deciding to opt out would entail significant risks.

- Requiring Google to provide clear and detailed information on how search content – including its own search content – is used to train and ground Gemini, AI Overviews and AI Mode, would be very beneficial.

- We applaud the CMA for seeking to give greater transparency to businesses that do wish for their search content to appear in Google's search generative AI features. We believe the proposals will provide significant benefits to us and our users.

Transparency

- We welcome the CMA's proposals to require Google to provide publishers with 'clear and detailed metrics' on user engagement with their search content in Google's search generative AI features.

- As outlined above, we dedicate a significant amount of resource to try and gain a clearer understanding of the impact of AI Overviews and AI Mode on our performance, in the absence of such information from Google.

- Even still, the information we do have is far from perfect. This has real implications for our business. It becomes much harder to forecast our future performance as Google's search generative AI features become more integrated into Google Search. This hinders effective business planning, budgeting and investment decisions. The impact is particularly profound for Skyscanner, considering investment in SEO and organic content has been such a fundamental pillar of our growth strategy.

- Without being able to understand how users are engaging with our content on AI Overviews and AI Mode, we also cannot make informed decisions about whether to invest in new forms of content or how best to optimise existing content for these new features. We do not have the resources that Google does to invest in new content that may not provide a return on investment.

- A lack of clarity on user engagement therefore reduces our investments in new content.

- Receiving 'clear and detailed metrics' from Google on user engagement with our search content would help address the issues outlined above, since this information directly influences how we invest in, build and optimise content. But only if user engagement data is provided on a 'per-feature' basis.

- This is essential because AI Overviews and AI Mode are fundamentally distinct features. Whereas AI Overviews seek to give factual answers to simple, often informational queries, AI Mode is a conversational surface that specialises in answering long-tail, more complex prompts. User behaviour is likely to be very different.

- These differences require materially different content, optimisation and product strategies. Without disaggregated reporting, effectively optimising for each environment would remain difficult. In such a scenario, we would dedicate the same resource as we do today trying to understand how users engage with our content differently on AI Overviews and AI Mode.

- Indeed, Google has indicated that the difference between AI Overviews and AI Mode is only going to grow, with the latter acting as a personalised assistant capable of carrying out the entire search and purchasing process without a user ever having to leave AI Mode. Agentic commerce will become increasingly central to AI Mode, with travel identified by Google as an early priority.

- Having metrics on how users engage with our content differently on these features will allow us to invest in feature-specific optimisation strategies with much greater confidence (including structured data, conversational content formats, and technical integrations).

- Considering the likely costs of potential technical integrations into AI Mode agentic experiences, feature level data on performance and user engagement will be required for us to make such important investment decisions around how we integrate with Google's plans.

- In short, 'per feature' user engagement data would improve investment efficiency and allow us to create more content of the type that is most useful to users of AI Mode and AI Overviews.

- This would clearly benefit consumers, since Skyscanner and other publishers would have more resource and more clarity to continue investing in high quality content and to experiment with new innovative content formats and technical integrations.

- The potential cost savings for us are also potentially much larger. If Google is required to provide data on a 'per-feature' basis, there is a high likelihood that other competition authorities around the world will follow the CMA's lead and impose similar requirements in other jurisdictions. This means that we could save considerably more money as a

result of the CMA's actions. For example, we spend $220,300 per year to monitor AI Mode performance in 19 markets, with monitoring of AI Overviews amounting to $313,425 per year for 36 markets.[1]

- Meanwhile, if we did not need to dedicate so much internal resource and time to understanding AI Overview and AI Mode performance we could spend more time identifying challenges and opportunities across other channels and markets to support our expansion.

- We do not foresee any risks from Google providing performance and user engagement data on a 'per-feature' basis.

- Disaggregated reporting may even benefit Google, since more publishers may decide not to opt out of their search content appearing in these search generative AI features if they have a clearer understanding of the impacts and growth opportunities.

Attribution

- At present, Google's approach to attribution is unclear. For example, it is not apparent to us why some results receive hyperlinks, while other citations are included down the side of the page.

- Meanwhile, our citation share appears to be lower than our overall visibility. For example, while we are featured in responses to flights-related prompts on AI Mode around [✂] of the time, we are only cited (where active Skyscanner links are included in the response) [✂] of the time, compared to 22% for Google Flights.

- Better attribution may lead to an improvement in our organic performance. This means that sources must be clear and salient, with active links to the sources that are clear and visible.

- For example, hyperlinks are – in our view – clearer and more user intuitive than the approach often used at present, with multiple sources listed together down the right side of the screen.

- Google should also be required to explain big discrepancies between a business' citation shares and overall visibility, with a general presumption that there should be a clear link to a business' page whenever they are mentioned or their content is used.

- Finally, it is important that Google is required to attribute its own products and services to the same extent, and in the same way, as products and services provided by equivalent services.

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[1] The figure for AI Overviews also includes Google Search monitoring.

Implementation

- In line with our comments on implementation for the fair ranking CR, it is vital that the CMA play an active oversight role in assessing Google's compliance with the Publisher CR.

- In particular, the CMA must require Google to demonstrate at regular intervals, through tests of its search generative AI products, that Google is complying with its obligations on attribution, including in relation to its own products and services, and that it is honouring decisions by publishers to opt out of their search content being used for the training and grounding of Gemini, AI Overviews and AI Mode.

- Similarly, the CMA should elicit regular feedback from third-parties regarding the level of user engagement data (which we hope will be disaggregated) being provided by Google, and whether this meets its obligations.