

# Competition and Markets Authority Annual Plan 2026 to 2027 Consultation

## Summary of responses

23 March 2026

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1. This document provides a summary of stakeholder feedback on the Competition and Markets Authority's (CMA) draft Annual Plan for 2026 to 2027.
2. This Annual Plan is the first detailed implementation plan under our new [2026 to 2029 Strategy](#), which lays out our purpose of promoting competition and protecting consumers with a clear end goal in mind: to drive economic growth and improve household prosperity. The draft Plan, published on 21 January 2026, set out annual priorities for each of our functions, alongside changes we are making to the way we work that are consistent with our 4Ps programme (pace, predictability, proportionality, process). The priorities in the draft Plan reflect the 5 objectives that underpin our Strategy, which are to:
  - Promote effective competition
  - Champion consumers
  - Help government deploy tailored pro-competition interventions to support growth, innovation and investment-related policies
  - Foster a UK regulatory landscape that attracts investment and instils business confidence
  - Prioritise UK interests
3. Through consultation, the CMA embraces the opportunity for stakeholders to feed in their perspectives on our work and where we can add most value in 2026 to 2027. We asked for comments on the draft Plan, including on our proposed priorities, and for suggestions on how we can engage effectively with our stakeholders in the year ahead.
4. We received 21 written responses to our consultation from a broad range of stakeholders. This feedback was supplemented by an engagement programme that reached more than 60 organisations, including:
  - Key organisations representing the voice of UK consumers at the inaugural meeting of our new Consumer Forum.
  - Representatives of major UK business and investor groups who participate in the CMA's Growth and Investment Council.
  - Stakeholders in Greater Manchester with insight into how the CMA can support industrial strategy.

#### *Stakeholder feedback on draft Annual Plan*

5. Many stakeholders broadly endorsed our draft Plan and welcomed specific priorities and areas of work. For example:

- Our role in helping government realise the full potential of public procurement, particularly by helping address systemic incumbency advantages that disadvantage SMEs and innovative firms.
  - The value that the CMA can add to implementation of the Industrial Strategy, and our efforts to work with government to examine how reform of the wider regulatory environment can promote competition and unlock opportunities for investment and growth.
  - The CMA's ongoing operational transformation and commitment to further embed the 4Ps framework right across our functions in 2026 to 2027.
6. Stakeholders also welcomed our commitment to consumer protection, and many aspects of our strategic approach to the new regime under the Digital Markets, Competition and Consumers Act 2024 (DMCCA) – particularly our commitment to prevent harm in areas of essential spend and at moments of vulnerability. We heard a range of perspectives in relation to the balance of interventions by the CMA in the new regime, where we have been transparent from the outset (for example, through our published [approach document](#)) that we will focus our early action on more egregious practices where the law is clear, consciously deploying a range of tools to protect consumers and support businesses that want to do the right thing. We have also heard business stakeholders express a need for clarity on the future implementation of the new subscription contracts regime under the DMCCA – where the CMA understands the government will set out an expected commencement timeline for these provisions in due course and will issue accompanying guidance.
7. Our purposeful and pragmatic approach in digital markets was also broadly endorsed by stakeholders. However, we note that some considered that the CMA should have moved to impose conduct requirements on Apple and Google, in respect of app certainty measures following our designation of these firms with 'strategic market status' in the provision of their mobile platforms in the UK, rather than seek to agree commitments for these issues. The CMA has set out that it has a wider programme of work on mobile platforms, with further measures to be outlined in the first half of 2026. For these specific app certainty issues, the CMA considers that meaningful commitments from Google and Apple could be a quick and effective route to deliver improved certainty, transparency and fairness for thousands of UK businesses, dependent on app stores to access their customers. The proposed commitments include rigorous monitoring and reporting requirements, and we will move quickly to bring forward conduct requirements in respect of these issues, including considering whether more stringent

measures are necessary, if these commitments are not adhered to or we find they are proving ineffective.

8. More broadly, we welcome all feedback from stakeholders around areas where that they would like to see the CMA take action not currently contemplated in our Plan. For example, in the car insurance, gaming and holiday park sectors. In our Annual Plan, we have been transparent about the way we make prioritisation decisions. To help ensure that we direct our focus and resource in the best way possible, we apply a set of prioritisation principles that direct us to consider factors including alignment with the CMA's Strategy and Strategic Steer from government, the likelihood of positive impact, and whether the CMA is best placed to act.

### *Adjustments to our Annual Plan*

9. As our draft Annual Plan broadly resonated with a diverse stakeholder community, we are not making significant changes to the final version. However, we are making some limited adjustments.
10. Some of these relate directly to stakeholder feedback. For example, we agree with several stakeholders who noted the potentially transformative effects of agentic AI for UK citizens and businesses, and so have made explicit reference to the way the CMA can help encourage safe, trusted adoption of this technology within a competitive marketplace. Since the publication of our draft Annual Plan, the CMA has issued [analysis](#) on how developments in agentic AI could affect consumers, and [guidance](#) for businesses on how to use agentic AI in compliance with consumer protection law.
11. We have also listened to business stakeholders who told us that they would like to see more definition around the balance between the pursuit of pace and effective outcomes (including the need to ensure due process) in competition enforcement – adjusting one of our priorities here.
12. Other changes are intended to clarify and update aspects of our approach. For example, we have laid out more detail on next steps in Search and Mobile Platforms, which are core priorities in digital markets this year, and in relation to our work on scaleups and anti-competitive regulation that could be a barrier to growth.
13. In a volatile external environment, we have made explicit that the CMA will be flexible and agile in the way we execute our Annual Plan. Not least in relation to the ongoing conflict in the Middle East, the effects of which could lead to increased cost of living pressures and uncertainty for UK businesses, and

which could require the CMA to respond swiftly to any evidence of harmful practices across the economy. We have, for instance, moved quickly to [examine heating oil](#) amid concerns about rising prices, and [set out plans](#) to step up monitoring of petrol and diesel prices.

### *Feedback on stakeholder engagement*

14. We were broadly encouraged by feedback on our approach to stakeholder engagement. Several stakeholders noted the step-change in more participative approaches across the CMA's functions, underpinned by the 'process' element of our 4Ps framework. The establishment of our new Consumer Forum was welcomed by consumer protection partners, and the ongoing work of the CMA's Growth and Investment Council was also endorsed by several businesses and investor stakeholders. However, we know that there is always more we can do to listen, learn, explain and raise awareness.
15. We note three areas of feedback in particular. Firstly, on the importance that many of our stakeholders attach to engaging with businesses of all sizes, which the CMA will continue to reflect in our approach. For example, through the extensive engagement with diverse businesses, including startups and scaleups, that is foundational to our participative approach in digital markets, and with SMEs around compliance with consumer protection law. We will also continue to engage closely with bodies that represent the interests of SMEs, startups and scaleups through our Growth and Investment Council, which includes the Federation of Small Businesses, British Chambers of Commerce, Startup Coalition and ScaleUp Institute.
16. Secondly, in relation to direct communication with consumers. We agree that there are circumstances where consumer-focussed guidance and communications on the part of the CMA can help raise vital awareness and deter poor corporate practices – whilst noting that other bodies have been appointed and funded to deliver direct consumer advice and support to the general public. For example, consistent with our drive on online pricing, our recent [practical tips for online shoppers](#), and a [consumer-focussed guide](#) on choosing and paying for dental care that accompanied the launch of our private dentistry market study.
17. Finally, on the best routes to understand the issues that consumers face. To exercise our role effectively, we recognise that we must maintain a firm understanding of how and where consumers are experiencing detriment. To this end, we will continue to leverage our position as an active participant in the UK's consumer protection landscape to ensure that consumer

perspectives are at the heart of our work. We will make maximum use of the various mechanisms that exist for coordination, intelligence-sharing and partnership working with enforcers and advocacy bodies – including new opportunities presented by our Consumer Forum, and existing structures such as the Consumer Protection Partnership and Consumer Concurrency Group.

### *Conclusion*

18. We thank all stakeholders who took the time to engage with this consultation and look forward to maintaining close and constructive dialogue in the year ahead. As set out in our Annual Plan, the CMA is committed to maintaining and deepening relationships with a truly diverse range of stakeholders. We will continue to seek and report on feedback in the year ahead, particularly through new stakeholder surveys that will help us benchmark our performance.

## **Annex: Organisations that engaged with the consultation**

### **Organisations that submitted written responses in writing**

- Checkatrade
- Community Planning Alliance
- Consumer Council for Northern Ireland
- Consumer Scotland
- Denplan
- Fair By Design
- Federation of Small Businesses Northern Ireland
- Holiday Park Action Group
- Middle Tech Coalition
- Minerals Products Association Northern Ireland
- Northern Ireland Housing Executive
- News Media Association
- Preiskel & Co LLP
- Skyscanner
- UK Private Capital
- VodafoneThree
- Walpole
- Which?

We also received three responses from individual members of the public.

## **Organisations that engaged with the CMA during the public consultation**

### **CMA Growth and Investment Council members**

- British Chambers of Commerce
- British Retail Consortium
- Confederation of British Industry
- Federation of Small Businesses
- Founders Forum Group
- London Stock Exchange
- ScaleUp Institute
- Startup Coalition
- techUK
- UK Finance
- UK Private Capital

### **CMA Consumer Forum members**

- Citizens Advice
- Citizens Advice Scotland
- Consumer Council for Northern Ireland
- Consumer Scotland
- Money and Mental Health Policy Institute
- Which?

### **Greater Manchester roundtable attendees**

- Greater Manchester Business Growth Hub
- Greater Manchester Combined Authority

### **Online consultation event attendees**

- ACT – The App Association
- Baker McKenzie
- Bristows LLP
- British Airways Plc.
- Cleary Gottlieb Steen & Hamilton LLP
- Consumer Council for Northern Ireland
- Consumer Scotland
- Consumers International
- Cooley LLP
- De Montfort University
- Dechert LLP
- Deloitte
- Eversheds Sutherland LLP
- Fingleton
- Flint Global
- Freshfields LLP
- Federation of Small Businesses Wales
- Gallagher
- Glasgow City Council – Trading Standards
- Global Competition Review

- Holiday Park Action Group
- International Air Transport Association
- Lancaster University
- Microsoft Corporation
- MSC Mediterranean Shipping Company
- National Grid
- Peg200-250
- Preiskel & Co LLP
- Publishers Association
- Renfrewshire Council
- ScaleUp Institute
- Society of the Chief Officers of Trading Standards in Scotland
- Skyscanner
- Startup Coalition
- Stephenson Harwood LLP
- Stewarts LLP
- Taylor Wessing LLP
- The Highland Council
- TLT LLP
- TruthEngine
- UK Regulators Network
- University of Exeter
- Vivienne Robinson Ltd
- VodafoneThree