

## **Search SMS: Proposed Fair Ranking CR Roundtable**

11 February 2026

### **Introduction**

As part of its consultation on proposed conduct requirements (**CRs**) relating to Google's Strategic Market Status (**SMS**) in general search services, launched on 28 January 2026, the CMA held a series of roundtables with affected industry stakeholders to gain feedback on the proposed CRs.

The events were chaired by the Project Director, Digital Markets and attended by other members of the CMA staff including the case team.

This note summarises the views expressed by 43 businesses and 7 trade associations who attended the Fair Ranking Roundtable. The CMA will consider these views alongside the wider body of evidence it has gathered through the consultation on the CRs.

### **Overview**

The CMA welcomed participants to the roundtable and set out the purpose of the session: to explain the proposed Fair Ranking CR and seek views from industry participants on the proposed CR.

CMA staff summarised the proposed CR for fair ranking, including its aim and scope, as set out in the [consultation document](#). Attendees were given an opportunity to respond and ask questions.

### **Evidence of concerns identified by the CMA**

A trade association representative asked the CMA if it was regulating for actual harms or seeking to address concerns of perception by providing assurance over the fairness of Google's organic ranking. Further to this, a business asked about the Reddit example set out in the consultation document as evidence of Google ranking on a discriminatory basis. The CMA stated that whilst it had not seen direct evidence of Google discriminating systematically in its organic search ranking based on the criteria it had set out, it had at this stage not sought to verify this through specific algorithmic testing. Nor had it done a spot-check to assess the specific Reddit example, which Google had stated was based on user preferences. However, the CMA considered the information asymmetry and broad lack of trust appeared to be having a tangible impact on publishers' investment decisions.

A participant asked the CMA whether it had considered recent research which presented the idea that guaranteed traffic from a search engine to services such as vertical search services could reduce competition in these adjacent markets. The CMA requested that the participant share such research as part of its response.

## **Key design considerations**

### ***Comments on the non-discrimination and objectivity element of the proposed CR***

A publisher asked if the CMA had already established thresholds for what it would consider discriminatory conduct, highlighting that small reductions in traffic could result in significant harm to smaller businesses. The CMA explained that it had not identified thresholds and that the proposed CR represented principles Google would have to abide by in designing and implementing its approach to ranking of organic search. The CMA added that when determining whether any issue raised constituted a breach, it would consider factors set out in its published guidance, and the CMA's prioritisation principles, to inform whether to launch a breach investigation. The CMA acknowledged that it would be mindful of the role of deterrence in ensuring a good standard of compliance with the principles, if the CR was imposed.

A representative of a trade association asked whether policies which were discriminatory by impact would be captured as well. The CMA explained that it would be for Google to demonstrate its compliance with the proposed CR and that, as set out in the consultation document, this could include auditable processes and reporting to the CMA. The CMA illustrated this with hypothetical examples of downranking a publisher's content where it had opted its content out of search generative AI features or up-ranking due to a commercial agreement, neither of which would be permissible under the proposed CR.

### ***Comments on the transparency element of the proposed CR***

A publisher asked how a delay between the imposition of a new ranking policy or signal and its impact may impact a business's ability to effectively trigger a complaint. The CMA took this point into consideration and welcomed further feedback in writing as part of the consultation.

Multiple participants expressed support for the CMA's proposed course of action and highlighted that a key concern was the impact of Google's 'core updates' where a lack of understanding and forewarning of how these updates impact ranking had significantly impacted their businesses. The CMA highlighted that the proposed interpretative notes for the CR included an indication that Google would need to provide 30 business days' notice of core updates.

Additionally, participants highlighted that, following core updates, they had not been able to make an effective complaint to Google nor to access effective support, for example in relation to the cloning of sites, and these cloned sites being promoted within Google Search. The CMA stated that Google's spam policy would be expected to address cloning concerns, which demonstrated the trade-offs faced by Google, and it needed to ensure that genuine policy considerations could be accounted for.

One publisher asked the CMA what level of granularity it expected and whether it could provide material examples of the enhanced transparency that would be provided. It also raised a concern that the language in the proposed CR could lead to ineffective implementation. The

CMA stated it welcomed further evidence and comments on this topic, including reasoned evidence on the level of granularity necessary.

A number of participants asked about the risk of bad actors making malicious use of increased transparency and whether the CMA had considered granting access only to verified publishers. The CMA said that it had explicitly accounted for this in its design of the proposed CR. It highlighted the UK Platform to Business Regulations, which exempts search engines from publishing ranking signals or proxy indicators which may result in gaming by bad actors. The CMA said that it could see potential definitional challenges in identifying what a ‘verified publisher’ may be, which could inadvertently advantage incumbent publishers to the detriment of new publishers. However, it welcomed feedback on this point.

### ***Comments on the non-distortion and complaints element of the proposed CR***

A participant raised a concern that Google would only act if it felt there was a genuine risk of consequences and urged the CMA to take this into consideration and make more explicit the consequences for non-compliance. The CMA welcomed further views on compliance and outlined that as part of the implementation of the measure, the CMA would require Google to demonstrate what steps it intends to take in order to be compliant and consider further action if necessary.

One business raised a concern that they believed Google does not abide by the Platform to Business Regulations currently and believed it would be helpful for the CMA to state its view on this topic in any final CR decision. The CMA responded that it could not state whether Google was complying with these regulations, but welcomed further discussions on this topic.

### **The scope of the proposed CR and issues related to self-preferencing**

The CMA was asked by a publisher whether the proposed CR would affect the placement of AI Overviews or AI Mode at the top of the results page, which the participant considered represented self-preferencing, and reduced the overall relevance of organic content that users may therefore not see as ‘below the fold’. The CMA explained that the proposed principles would apply to ranking within organic search features (including features such as AI Overviews and the Flights Unit) and those search features relative to other organic results that made up the results page. It did not, however, seek to introduce specific rules regarding their design or access terms. These types of issues could potentially be addressed by a ‘fair treatment of specialised search’ measure, which the CMA had identified in Category 2, as set out in the CMA’s [Search Roadmap](#). The CMA noted that they were taking account of related developments in the EU in this space.

One specialised search service raised concerns about relevance to the user as a key consideration, noting that Google would be able to offer users richer features within the results page than third parties, especially competing vertical search services. It also highlighted a concern that, due to information asymmetry, Google would be able to more effectively optimise its own services for ranking within Google Search. The CMA stated that the first concern mentioned could potentially fall within the proposed category 2 measures outlined in the CMA’s

Roadmap, but was not within the scope of the proposed Fair Ranking measure. Relating to the latter point, the CMA welcome further views in particular on how Google could demonstrate compliance with the proposed CR.

The CMA was asked by a publisher whether it had considered the value of users being directly provided links to publishers' websites over the display of content from these websites within an AI Overview. The CMA stated its objective was not to ensure that one type of result was favoured over another, rather that users be presented the most relevant result on a non-discriminatory basis.

A representative of a trade association stated that it appeared that many publishers and specialised search services had more significant concerns outside of organic ranking and questioned if these measures were worth the trade-offs in prioritisation. The CMA responded that it had received evidence that organic ranking was of significant concern, but acknowledged that there were other significant concerns, including those that could potentially be addressed by Category 2 measures.

One specialised search service supported the CMA's view that although these may not address all of the business concerns they were of importance and supported the CMA's proposed measures.

### ***Implementation and monitoring of the proposed CR***

The CMA was asked by a representative of a trade association how it arrived at a 6-month implementation period following the entry into force of the CR, and whether this included the 30 business days' notice period for core updates. The CMA stated that this was the period that it believed to be proportionate, but welcomed views on the implementation period. Regarding the notice period, Google would be expected to offer a minimum of 30 business days' notice for any qualifying changes from the point of the proposed CR being implemented.