



Response to CMA Call for Evidence on the Proposed commitments from Apple and Google on App Store Processes
2 March 2026

On behalf of Chamber of Progress – a tech industry association supporting public policies to build a more inclusive society in which all people benefit from technological advancements – we welcome this opportunity to provide the Competition & Markets Authority (CMA) feedback on the potential interventions to provide more certainty for developers on app distribution by Apple and Google, as well as to enable developers to request interoperable access to functionality from Apple (the Commitments)¹. We understand the concern that many stakeholders do not trust that Apple and Google’s existing processes for App review and development are being followed, and agree that providing further clarity through these commitments could have positive consequences for the UK App economy.

Nevertheless, in a recent survey, UK App developers gave Apple and Google app stores an average score of 8.3/10 each,² suggesting broad satisfaction with the current app development ecosystem. It’s therefore proportionate for the CMA to seek to improve the situation through commitments before resorting to more intrusive interventions.

That said we have identified three areas on the Commitments where further clarity or refinement could improve outcomes for UK consumers and businesses, in particular: (1) App review timelines, (2) Interoperability, and (3) Monitoring. We address these in turn below.

1. App Review Timelines: The Case for Flexibility Over Mandates

Chamber of Progress welcomes the CMA’s focus on improving certainty and transparency in app review processes. Clear communication, predictable engagement, and responsive dispute resolution meaningfully improve developer confidence.

¹ CMA “Proposed commitments from Apple and Google: app certainty and interoperable access” (10 February 2026), available [here](#).

² MTM “UK developer attitudes towards app stores” (July 2025), available [here](#).

However, we caution against mandating rigid review timelines.

App ecosystems are dynamic. Review times can legitimately vary depending on:

- The novelty or sensitivity of the service or business model;
- Security or privacy implications;
- Integration with new APIs or system features;
- Potential consumer protection concerns.

Particularly where new categories of services are concerned, deeper technical and policy assessment may be necessary. Imposing fixed deadlines risks creating perverse incentives: either rushed approvals that compromise user trust, or defensive rejections designed to avoid breaching promised timeframes.

A commitment to review “as quickly as possible”, combined with transparency around typical timeframes and escalation mechanisms, strikes a more appropriate balance. It allows the CMA to monitor trends without forcing platforms into artificial compliance behaviour. The objective should be predictability, not rigidity.

In this respect, the proposed commitments appropriately recognise the operational realities of platform governance while strengthening clarity for developers.

2. Interoperability: Balancing Access with Property Rights and Platform Competition

We welcome Apple’s efforts to improve structured and transparent pathways for interoperability requests. Clear processes, defined criteria, and reasoned explanations for decisions can build trust and reduce friction.

At the same time, interoperability must be balanced against legitimate property rights and platform design autonomy. Platform operators compete not only within their own ecosystems, but against other global platforms. Decisions about API exposure, system architecture, security boundaries, and feature prioritisation are core elements of that competitive strategy.

Mandating access without regard to these considerations risks:

- Undermining incentives to invest in differentiated features;
- Weakening platform security or integrity;

- Distorting inter-platform competition.

The proposed commitments appropriately recognise that Apple may prioritise certain interoperability requests over others and may decline requests where duly justified. Apple’s commitment to “inform developers of the outcome of its review of their requests, and the associated reasoning for this outcome” enhances accountability without stripping away strategic discretion.

This calibrated approach is preferable to prescriptive access mandates. It enhances transparency while preserving innovation incentives.

3. Monitoring Effectiveness: Metrics Should Inform, Not Predetermine Outcomes

We support the CMA’s intention to monitor implementation through measurable indicators such as review times, appeal outcomes, complaints, and interoperability requests.

The proposed metrics appear sufficient to assess whether the commitments are delivering practical improvements. However, monitoring should remain evidence-led and avoid pre-determined expectations about what “success” must look like.

The UK app development ecosystem is diverse. Barriers to entry are low. This is a strength. It enables experimentation and innovation. It also means the developer community includes a wide range of experience levels, business models, and expectations.

It is important that regulatory assessment does not over-weight the views of a small minority of developers, no matter how vocal, and particularly where complaints may stem from disagreements with content policies or security standards.

The vast majority of developers successfully launch and update apps without incident. Monitoring should therefore focus on systemic patterns rather than anecdotal disputes.

A proportionate, data-driven approach will reinforce trust on all sides. Over-interpreting normal friction within a large and open ecosystem risks generating unnecessary regulatory escalation.

Concluding Remarks

Taken together, the proposed Commitments position the United Kingdom at the forefront of pragmatic digital market governance.

By securing structured improvements to transparency, review processes and interoperability pathways through a commitments-based approach, the CMA is delivering tangible benefits for UK developers more swiftly than prolonged and adversarial proceedings would allow. This creates a meaningful competitive advantage for the UK ecosystem.

By accepting these Commitments, UK developers will benefit from:

- Clearer explanations for app review decisions and interoperability outcomes, reducing uncertainty and enabling faster iteration and product refinement.
- More structured escalation and appeal channels, giving developers confidence that disputes will be addressed predictably and within a defined framework.
- Greater transparency around ranking processes and the handling of developer data, allowing businesses to plan with improved commercial certainty.
- Enhanced engagement and communication pathways with Apple and Google specific to the UK context, ensuring that UK-based developers benefit from clearer points of contact, improved information flows, and a more structured dialogue with platform operators.

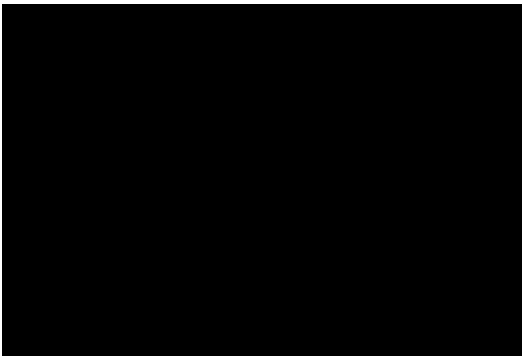
These are practical, day-to-day improvements. For a small UK startup preparing a product launch, greater predictability in review timelines can support hiring and marketing decisions. For established developers, improved appeal mechanisms reduce the commercial risk associated with updates and feature expansion.

Few other jurisdictions have been able to achieve comparable process-focused improvements without extensive litigation or rigid prescriptive mandates. The CMA's approach demonstrates that proportionate, evidence-based engagement can strengthen accountability while preserving incentives to innovate. It aligns incentives; Apple and Google are encouraged to continue investing in the UK developer ecosystem, while developers benefit from enhanced transparency and procedural safeguards.

This framework is also consistent with the objectives of the Digital Markets, Competition and Consumers Act and the CMA's commitment to delivering the 4Ps of pace, predictability, proportionality and process.³ A regime that improves clarity and responsiveness without undermining property rights, platform security, or legitimate competitive strategy reinforces the UK's reputation as a jurisdiction that values both innovation and fairness.

Chamber of Progress remains committed to supporting the CMA in the effective implementation of the DMCCA and in ensuring that the UK digital economy continues to grow, compete and lead globally.

Sincerely,



³ CMA "Delivering the 4Ps under the Digital Markets Competition Regime" (30 April 2025), available [here](#).