

Vivaldi Technologies AS, Mølleparken 6, Oslo, Norway, 2 March 2026.

Response to “Potential interventions to enable developers to request interoperable access to functionality from Apple” (10 Feb 2026)

We agree with the Competition and Markets Authority’s assertion that “it is important that developers have interoperable access to key functionality in Apple’s iOS and iPadOS”.

Vivaldi wishes to ship its browser on iOS using its own chosen engine in order to reduce costs and enhance its iOS product so that it achieves feature parity with its equivalent product on all other platforms. The current restriction that all browsers must use Apple’s WebKit prevents this; we look forward to CMA imposing strong conduct requirements that will allow other engines on iOS, with firm anti-circumvention safeguards.

However, it is plausible that we could augment the limited functionality available in the system WebKit, if provided interoperable access to various iOS services. For example, access to the “Add to Homescreen” functionality, which Apple reserves for its own “Share” menu, would allow Vivaldi to offer Progressive Web App (PWA) install prompts. If we wished to add Web Bluetooth functionality to our browser, we would need access to the system Bluetooth service, which Apple makes available to developers of its single-platform native apps, but does not permit its system WebKit to access.

We remain strongly of the view that the CMA should create a default interoperability requirement, notwithstanding its statement in the [Apple Roadmap \(23 July 2025\)](#)¹. Apple’s proposed commitments would likely prevent us from shipping the product we seek to offer, for several reasons.

Apple states:

“Apple will launch a dedicated interoperability feedback channel for developers to submit interoperability requests to Apple ... The feedback channel will be available to developers that are members in good standing of the Developer Program and whose account membership with the Developer Program is registered in the UK.”

Vivaldi is headquartered in Oslo and thus our membership with the Developer Program is registered in Norway. This excludes us from eligibility to request interoperability under the proposed framework, despite the fact that we currently serve [REDACTED] customers in the UK who would benefit from enhanced functionality.

Apple further states:

“Apple will make clear the kinds of requests that are eligible for consideration under the feedback channel, namely requests for access to equivalent system and hardware functionality used by Apple services or accessories.”

The scope of the term “equivalent” introduces ambiguity. Apple services on iOS access Bluetooth functionality. It offers [Bluetooth access to developers of iOS Apps](#) for its single-platform centralised App Store². However, Apple has chosen not to support Web Bluetooth in its Safari browser, which is a legitimate commercial decision. The wording above raises concern that Apple may interpret “equivalent” to mean that third-party web browsers can only access functionality already used by Apple’s own web

1 https://assets.publishing.service.gov.uk/media/687f893cf2ecaeb756d0e1e6/Roadmap_Apple_.pdf

2 <https://developer.apple.com/documentation/corebluetooth/>

browser, thereby extending its internal product decisions to competitors.

Apple also states:

*“Apple will assess eligible requests against the following set of criteria: (i) expected user and developer uptake; (ii) **alignment with Apple’s platform priorities**; (iii) potential implementation costs; (iv) potential impact on user experience, **performance/battery**, security, safety, **privacy**, integrity, and accessibility; and (v) potential impact on Apple’s intellectual property rights ...*

*Receiving a request through the feedback channel **will not create any obligation or expectation that Apple will commit to building a specific requested feature** (or, if Apple does choose to build a requested feature, whether or not it will make it available to the Eligible Developer or developers generally for a fee), which will remain at Apple’s discretion **in line with its commercial strategy and priorities.**” (Emphasis added.)*

These provisions leave ultimate discretion with Apple. Where Apple also competes downstream with third-party services, this structural position creates the risk that access decisions may influence competitive outcomes. An effective conduct requirement must therefore address the substantive decision-making power itself, not only the transparency surrounding it.

In CMA’s previous [assessment of Strategic Market Status](#), CMA wrote



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If the adverse effect on competition arises from Apple’s unilateral ability to decide whether and how access is granted, a framework that expressly preserves that discretion may not effectively address the identified concern.

The commitments do not:

- Establish a duty to grant access where defined criteria are satisfied;
- Create a presumption in favour of interoperability;
- Require refusals to meet an objective justification standard.


, and the conduct documented in U.S. Justice Department’s [antitrust lawsuit against Apple](#) for monopolization or attempted monopolization of smartphone markets⁴, Apple’s commercial strategy has consistently emphasised ecosystem integration. As [Steve Jobs wrote in 2010](#):

“Tie all of our products together, so we further lock customers into our ecosystem”⁵.

Under the proposed commitments, Apple retains the ability to deny interoperability requests that it

³ https://assets.publishing.service.gov.uk/media/62a0cdb0d3bf7f0372734789/Appendix_L_-_SMS_assessment.pdf, paragraphs 28-29

⁴ <https://www.justice.gov/archives/opa/pr/justice-department-sues-apple-monopolizing-smartphone-markets>

⁵ <https://www.thetechstorm.com/steve-jobs-was-keen-on-locking-customers-into-apples-ecosystem/>

considers inconsistent with its commercial strategy and priorities.

The criteria relating to privacy, performance, and battery life also raise concern. Users have the right to choose the products they wish to use, including products that may involve trade-offs in performance or battery usage. Apple permits users to enable WiFi, Bluetooth, the flashlight function, or other system functions that affect performance and battery life, and does not restrict those uses. Similar trade-offs should not be invoked selectively to deny software interoperability.

Apple's proposed commitments lack:

- Objective benchmarks;
- Defined evidentiary standards;
- A structured necessity and proportionality test;
- Independent review of how the criteria are applied.

Degradation of “user experience” is so ill-defined it is effectively meaningless, and entirely at Apple's discretion. We note that many respected user experience consultants have said that Apple's recent Liquid Glass design changes to iOS are detrimental to user experience: “iOS 26's visual language obscures content instead of letting it take the spotlight ...Apple is prioritizing spectacle over usability” ([NN/g](#))⁶ and “they've stopped caring about user experience, accessibility, and detailed QA tests altogether” ([John Ozbay](#))⁷.

Vivaldi considers Apple's proposed commitments to be too weak and too vague to ensure meaningful interoperability. They do not appear to create enforceable rights for developers and rely heavily on Apple's discretion. We are therefore surprised that the CMA considers them sufficient to foster meaningful interoperability, particularly given the detailed documentation published by the CMA in December which did not mention accepting non-binding promises as even a possible outcome.

Vivaldi urges the CMA to impose formal conduct requirements on Apple that allow international companies, including Vivaldi, to offer UK customers genuinely competitive products on iOS and iPadOS.

Such formal requirements should mandate:

- **Interoperability by design**, rather than a reactive and discretionary request-based system. The process for granting interoperability should be transparent and non-discriminatory, and not subject to unilateral denial at Apple's discretion.
- **Enforceable deadlines and public oversight**, including clear processes, defined timelines, and effective remedies where interoperability is denied or delayed.
- **Equal access to software and hardware APIs on a FRAND basis**, ensuring that third-party applications can compete on equivalent technical terms with Apple's own services, a functional equivalence obligation, and a clear non-discrimination standard.

We're grateful for the opportunity to give our opinions, and are happy to answer any questions.

6 <https://www.nngroup.com/articles/liquid-glass/>

7 <https://blog.johnozbay.com/what-happened-to-apples-attention-to-detail.html>