

Views sought: Recent developments in relation to Apple’s and Google’s app store rules

Overview

1. In this document we seek views on changes that Apple and/or Google have made (or propose to make) in relation to their app store rules in a number of jurisdictions, including the UK. Responses received will inform our own thinking on potential steering measures that we expect to bring forward in the first half of 2026.
2. As we explained in our Roadmaps,¹ many UK businesses today use a native app as a key part of their digital offering – from transport to takeaways, retail, finance and fitness – these businesses range from large corporates to small start-ups across many different sectors of the economy, including in key growth areas of the economy like gaming and FinTech. Accordingly, Apple’s and Google’s app store rules affect hundreds of thousands of businesses across the UK economy who use native apps to market and sell their products and services.
3. As identified in our SMS designation decisions for Apple and Google, Apple is the sole distributor of native apps on Apple mobile devices and whilst other app stores are available on Android, Google’s Play Store is ‘must have’ for developers. This means developers have little choice but to accept the terms and conditions imposed for distribution of their native apps to reach consumers. This includes app store commissions charged. Apple and Google currently charge a maximum rate of 30% commission for the sale of digital goods and services through native apps in the UK, with a discounted rate of 15% for some developers, eg for smaller developers.²
4. In our Roadmaps we set out that we are exploring measures to promote greater competition in relation to Apple’s and Google’s app distribution. In particular, we highlighted taking action to address ‘**steering restrictions**’ imposed by Apple and Google which restrict the ability of app developers to steer their users to alternative ways to transact off of the app, for example on

¹ [Apple Roadmap](#), [Google Roadmap](#).

² Both Apple and Google also offer exemptions to commissions in instances such as where the app is used to consume content purchased elsewhere, and discounts for developers participating in various partnership programs.

the developer's own website where a transaction would not be subject to the same commission fees.³

5. A potential steering intervention would allow app developers serving UK consumers to inform or steer users outside of the app store from within the app itself, for example by providing a link to an external website to complete transactions.⁴ The removal of this restriction could have significant benefits for UK mobile users and app developers as well for businesses across the economy more widely:
 - a. For app developers it could:
 - i. result in lower costs if more transactions take place outside the app stores. Developers have told us that this cost saving could enable them to invest in new features and services or pass those savings onto their users.
 - ii. enable UK app developers to have a direct relationship with their customers, enabling them to freely set commercial terms, control refunds, and conduct promotions.
 - iii. result in greater flexibility of business models for app developers, for example subscription vs advertising funded models, as well as enabling greater innovation in their existing product offerings (for example the ability to bundle physical and digital goods and services).
 - b. For UK mobile users it could:
 - i. result in lower prices for digital content and services.
 - ii. deliver a wider choice of higher quality innovative goods and services.
 - c. For other businesses:
 - i. Some native apps are themselves platforms, bringing together UK users and wider businesses (for example content creators). Any savings for these businesses could therefore flow through

³ We note that developers are able to engage and transact with users through other channels outside of the app stores, eg through the open web, other marketplaces, social media, email, messaging, push notifications, offline ads, online ads and through partnerships.

⁴ [Apple Roadmap](#) paragraph 3.18, [Google Roadmap](#) paragraph 3.19.

to both the businesses the platform serves and those businesses' customers.

- ii. Steering could also open up opportunities for third party payment processors to process payments for transactions completed outside of the app stores.
6. Furthermore, increased competitive pressure between transactions taking place on and off the app stores could place downward pressure on Apple's and Google's current commission rates, as well as providing incentives for them to offer improved terms, conditions and services.
 7. UK mobile users spent over £[0-5] billion in 2024 on the App Store and £[0-5] billion on the Play Store, with £[0-2] billion of this going to Apple in commission fees and £[0-2] billion going to Google.⁵ UK mobile users use native apps created by developers across the globe, however considering those UK app developers who currently pay the most commission, these fall in strategically important sectors for the UK government, including UK gaming, UK streaming services and UK news publishers.
 8. Consistent with our published Roadmaps⁶ and programme update,⁷ we continue to prioritise steering. In order to inform this thinking, we are looking to learn from relevant international developments and are seeking views on these through this update. Submissions will support our own thinking on potential steering measures that we expect to bring forward in the first half of 2026.
 9. Since the Roadmaps were published in July 2025, there have been many relevant developments in relation to Apple's and Google's app store rules in other jurisdictions that we have been monitoring closely. We have identified several relevant developments on which we would like to better understand the views of interested stakeholders. In particular, we are keen to (1) learn from these experiences about what is and is not likely to be effective and (2) ascertain whether there may be real benefits for developers operating across jurisdictions in some degree of alignment in steering rules internationally.

Apple and Google's (proposed) changes to app store rules

⁵ [Apple SMS decision, Appendix A](#), paragraph A.61; and [Google SMS decision, Appendix A](#), paragraph A.72.

⁶ [Apple Roadmap](#) paragraphs 3.17-3.22, [Google Roadmap](#) paragraphs 3.17-3.23.

⁷ [The CMA's programme of work across mobile platforms](#)

10. The changes that Apple and Google have made, or proposed to make, to their respective app stores' terms and conditions have often been in response to new laws, regulations or litigation outcomes. Where that is the case, we note that relevant authorities may still be considering whether these changes are compliant with all local laws and regulations.

11. These changes broadly relate to:⁸

- a. **Fees:** Apple and Google have generally sought to charge developers a fee when using their respective app stores, including when facilitating a steered transaction. They argue that they are entitled to fair remuneration for the services provided, including when developers steer users, as well as emphasising the potential incentive effect that a loss of revenue would have on the levels of investment in these app stores.
- b. **Design choices:** The extent to which developers and/or users can make an informed choice to offer to/complete a transaction outside of the relevant app store. We recognise that whilst there may be benefits from doing so, these are also other relevant considerations (for example the potential for lower security and privacy protections, or the loss of centralised billing and management).

12. We have sought to set out the most relevant recent changes, or proposed changes, below although we also welcome views on any other relevant developments.

Apple

13. In Japan,⁹ as of December 2025, Apple now allows developers to steer their users. This:

- a. Permits developers to link/steer users to a website for the purposes of completing a transaction (with certain exception such as, apps in the 'Kids' category, or where users are under 13 years old, and where

⁸ For example, Apple and Google have made related points [Apple Response to the CMA's Proposed Designation Decision and Interventions Roadmap](#), paragraphs 123-134; and [Google's blog, 19 March 2025](#).

⁹ Apple has made similar changes to those described in paragraphs 13 and 14 in relation to steering and alternative app distribution respectively in Brazil.

users are 13 to 18 years old purchase flow options that involve steering must be behind a parental gate);

- b. Requires apps to pay a commission of 15% on transactions for digital goods and services when steered (reduced to 10% for certain developers) if the transaction was completed within seven days of the user tapping the link;¹⁰ and
- c. Requires any steering links always to be presented alongside Apple's In-App Purchase and include a system disclosure sheet for alternative payment processing methods that explains to the user they will be transacting with the developer and not with Apple.¹¹

14. In addition, in Japan:

- a. Apple allows the distribution of native apps through alternative app stores, subject to a 5% commission on the sale outside the App Store of digital goods and services for use within apps on the Apple platform;
- b. Allows developers to offer an alternative payment processing method in-app (subject to the developer presenting Apple's In-App Purchase alongside, and showing the disclosure sheet before routing the user to the alternative payment processing method);
- c. Transactions within App Store apps (with the exception of steered transactions) pay a commission of 10%¹² or 21% (plus 5% if Apple's In-App Purchase is used);¹³ and
- d. Apple is permitted to set limits on the distribution of alternative app stores, the provision of alternative payments and steering for "justifiable reasons"¹⁴ or to protect intellectual property rights.

¹⁰ Small Business Program, Video Partner Program, Mini Apps Partner Program, and for subscriptions following their first year; [Apple announces changes to iOS in Japan](#).

¹¹ [Apple announces changes to iOS in Japan](#).

¹² For developers in the Small Business Program, Video Partner Program, and the Mini Apps Partner Program, and for subscriptions following the first year.

¹³ [Apple announces changes to iOS in Japan](#).

¹⁴ These include to ensure cybersecurity on smartphones, safeguarding minors, and to prevent criminal activities or the abnormal operations of smartphones; [JFTC, Summary of Mobile Software Competition Act Subordinate Legislation and Guidelines](#).

15. In the US, Apple is currently required to not prohibit steering for any apps;¹⁵ not to add any frictions to steering other than a neutral-language screen telling users they are going to a third-party site;¹⁶ and, to charge no commission for steered transactions. However, in December 2024 the Ninth Circuit of Appeals modified, in part, the district court's order, and remanded other aspects to the district court. Notably, the Ninth Circuit stated that Apple should be able to charge a commission on linked-out purchases and recommended some possible courses of action to the district court for how an appropriate commission or fee could be determined. This included a cost-based measure based on costs that are genuinely and reasonably necessary for coordinating external links.¹⁷

16. In the EU, following a non-compliance decision by the European Commission, Apple has implemented alternative business terms that let developers opt out of the standard App Store model to offer steered transactions using external payment systems.¹⁸ The fee structure for these alternative business terms is split into different elements:

- a. Core Technology Commission: A 5% fee on all digital purchases on Apple's platforms.
- b. Initial acquisition fee: A 2% fee after a user purchases an app using an actionable link within six months after their initial unpaid download of the app (developers on the Small Business Program are excluded from this fee).
- c. Store Services fee: A commission of 5% or 13% on digital transactions using the App Store using an actionable link within a 12-month period of an install or update (two tiers depending on the services that the developer wants access to; the higher tier is reduced to 10% for certain smaller developers) or subscriptions after the first year.
- d. Under these changes in the EU, developers can communicate and promote offers for purchases available at a destination of their choice. The destination can be a website, alternative app marketplace, or

¹⁵ United States Court of Appeals for the Ninth Circuit, [Epic Games Inc v Apple Inc](#), 11 December 2025, page 26.

¹⁶ [United States District Court Northern District of California, Epic Games Inc v Apple Inc, 30 April 2025, page 75.](#)

¹⁷ United States Court of Appeals for the Ninth Circuit, [Epic Games Inc v Apple Inc](#), 11 December 2025, page 41.

¹⁸ [Apple, Developer Support, Communication and promotion of offers on the App Store in the EU.](#)

another app, and can be accessed outside the app or via a web view or native experience.

Google

17. In March 2026, Google announced changes to steering that it plans to roll out globally (except in the US) over the course of 2026 and 2027, including to the UK. Under these changes:¹⁹

- a. Developers will be able to steer their users outside of their Play app to complete a transaction.
- b. For steered transactions, Google will charge developers 10% for their first \$1 million of annual earnings, 10% for recurring transactions, 15% for non-recurring transactions in games that qualify for the ‘Games Level Up’ program or apps that qualify for the ‘App Experience’ program, and 20% for other non-recurring transactions.
- c. Any links will be presented alongside Google’s Google Play Billing.²⁰

18. In addition, Google will change other app store rules, including:²¹

- a. Introducing a charge for Google Play Billing (at 5%) that is separate from the Play service fee, meaning that developers will have the option to offer Google Play Billing or an alternative billing provider; and
- b. Introduce its ‘Registered App Stores’ program which will provide a more streamlined installation flow for qualifying Android app stores.

19. In the US, Google is currently subject to an injunction²² that requires it to enable catalogue access to third-party Android app stores for a period of three years, exclusively in the US.²³ This requirement is also included in Google’s most recent proposed modified injunction in the US, alongside many of the terms described above. The proposed modified injunction is subject to approval by the US Court.

¹⁹ [A new era for choice and openness.](#)

²⁰ Term Sheet- Exhibit A, page 4, filed 4 March 2026.

²¹ [A new era for choice and openness.](#)

²² Permanent injunction dated 10 July 2024.

²³ [Term Sheet- Exhibit 4](#), paragraph 11, filed 3 April 2026

20. In the EU, following a non-compliance preliminary finding by the European Commission,²⁴ Google updated its general access conditions for Google Play in the EEA, including adjusting its fees. Google has publicly stated that it plans to roll out the proposed changes described in paragraphs 17-18 in the EEA during the course of 2026.²⁵

Next steps

21. We would like to seek views from interested parties, particularly UK-based developers. We recognise that developers may be affected differently by potential changes depending on their circumstances, eg smaller developers that often do not pay the highest commission rates make up a large proportion of the UK developer base, and so we would welcome a broad range of perspectives.

22. In light of all of the above, we would particularly like to understand:

- a. For developments relating to steering, the impact these developments are having, or are likely to have, for **developers** and **users** and in turn how these affect the **likelihood of adopting steering**. We are particularly interested in understanding the potential impact of **the following**:
 - i. the app store service fees paid for steered transactions, and the extent to which these reflect a fair and reasonable charge for the services provided;
 - ii. how the steering experience is designed and any other relevant factors (for example, the requirement to offer steered transactions alongside Apple's and Google's own billing systems and the use of interstitial screens including user disclosures); as well as
 - iii. the effect, or otherwise, of these developments on users' privacy and security or prevalence of fraud (including any examples or evidence relating to the extent to which any privacy, security or fraud risks have materialised as a result of the introduction of steered transactions).

²⁴ [Commission sends preliminary findings to Alphabet under the Digital Markets Act](#)

²⁵ [A new era for choice and openness](#); we note that any final terms would be subject to the EU's Digital Markets Act.

- b. For developments relating to wider app store rules, the extent to which these changes can or would be likely to swiftly and effectively increase competitive pressure on Apple's and Google's app distribution, benefitting UK mobile users and developers and thus potentially reducing (or not) the need for any steering intervention.

- 23. Should stakeholders have views on the developments described in this document (or other developments), they can be provided via email at mobileSMS@cma.gov.uk by 5pm on 22 April 2026. Should any aspects of your views be confidential, we ask that you also provide a non-confidential version of your views alongside your response.

- 24. Any views will be considered alongside ongoing engagement with stakeholders, ahead of a planned consultation on potential measures in relation to steering in the first half of 2026.