

## **CMA response to stakeholder views on 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**

### **Overview**

1. In this document we set out the Competition and Markets Authority's ('CMA') response to stakeholder views raised in respect of commitments voluntarily made by Apple and Google to the CMA to provide more certainty for developers on app distribution, as well as to enable developers to request interoperable access to functionality from Apple.
2. Apple's and Google's mobile platforms are used by thousands of businesses across the UK economy to market and sell products and services, including via apps to millions of customers. App developers wishing to distribute their apps on iOS and iPadOS – the operating systems for iPhone and iPad respectively - must distribute through Apple's App Store, and for Android, they are largely reliant on Google's Play Store. All apps distributed on these stores must first successfully pass Apple's and Google's app review processes. It is important that UK app developers understand and are treated fairly during this process and have sufficient certainty that they will be able to continue to distribute their apps and serve their customers effectively.
3. Similarly, it is important that app developers have confidence that the app store search algorithms will operate fairly and objectively, and that data they provide to Apple and Google in order to be listed on their app stores will not be used unfairly by these firms, for example to develop their own competing apps. Together these give app developers and others the confidence to invest and grow, without the risk of subsequent, potentially business-ending, changes by Apple and/or Google.
4. Furthermore, it is important that developers have interoperable access to key functionality in Apple's iOS and iPadOS. Without the ability to access these enabling functions, UK developers cannot create the full range of innovative products and services that they would do otherwise, and UK consumers miss out as a result.

5. In February 2026, we explained that Apple and Google had proposed commitments to provide UK developers with increased transparency and certainty in respect of these areas. These were developed separately by the firms, reflecting their different processes and procedures. They committed to take action to:
  - **App review:** Review apps to be distributed in their app stores, in a fair, objective and transparent manner;
  - **Ranking of apps:** Rank apps in their app stores in a fair, objective and transparent manner;
  - **Use of data:** Not use data associated with the apps that it hosts on their app stores unfairly, such as for their own app development purposes; and
  - **Interoperable access to key functionality (Apple only):** Ensure that decision-making in respect of requests for interoperable access to key functionality is fair, objective and transparent.
6. We published Apple’s and Google’s proposed commitments and sought stakeholder views between 10 February and 3 March 2026. We received 53 responses: 34 from individuals and small developers, 15 from trade bodies and associations, and 4 from large developers. The CMA also met with some stakeholders to discuss their views.
7. This document responds to the feedback we received and explains our decision. We have published non-confidential versions of written submissions on the CMA website.<sup>1</sup> This document is not intended to summarise responses in detail or exhaustively. It sets out the general views received and all material points raised in relation to the questions on which we sought views.

## **Outcome**

8. We have reviewed all respondents’ submissions and views and engaged with Apple and Google on the feedback respondents raised. Both firms have put forward revised commitments with changes to respond to feedback (‘final commitments’). Their respective final commitments are included in Annexes 1 and 2. More detail on our analysis of stakeholder responses and the changes that Apple and Google have made is set out in ‘The CMA’s analysis of responses’ section.

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<sup>1</sup> [Proposed commitments from Apple and Google: app certainty and interoperable access - GOV.UK](#)

9. Having considered respondents' feedback and Apple's and Google's final commitments, we consider that the measures are likely to bring greater certainty to all developers that their apps will be reviewed, ranked and their data used fairly, objectively and transparently by Apple and Google. The interoperability measures in Apple's final commitments should also provide greater certainty to developers requesting access to functionality within Apple's mobile operating system.
10. We note that most respondents disagreed with the proposed introduction of commitments by Apple and Google in this area.<sup>2</sup> In this particular circumstance we consider that these commitments, rather than formal statutory requirements, are the swiftest and most pragmatic means by which to address the transparency and certainty concerns that we have heard in respect of the app review, app ranking and use of data processes and for interoperability requests, and to deliver immediate impacts for developers and users while allowing the CMA to deploy its resources to maximum effect.
11. Should our monitoring and oversight of Apple's and Google's delivery of their commitments indicate that they are not being adhered to, proving ineffective, or are otherwise not working as intended, then we will be in a position to promptly consider the imposition of Conduct Requirements ('CRs').
12. Our goal is to deliver meaningful outcomes to UK consumers and businesses as swiftly and effectively as possible, taking into account the particular circumstances of the issues we are looking to address. As such, in this context, taking into account the improvements the firms we have been able to secure from the firms to their respective commitments to address specific stakeholder feedback, and the speed to impact that these revised commitments can deliver, the CMA has decided not to prioritise CRs in this area at this time.<sup>3</sup>
13. This is only the first step in respect of our work on mobile platforms. As we set out in our recent programme update,<sup>4</sup> we plan to push forward with work this year in respect of steering – on which we have published an interim step today<sup>5</sup> – as well as digital wallets, browsers, connected devices and continuing to monitor the impact of AI.

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<sup>2</sup> We consider this feedback in more detail in 'The CMA's analysis of responses' section.

<sup>3</sup> The CMA's assessment has focused on the specific commitments made by Apple and Google, and we make no comment or conclusions on the contextual and background information provided by the firms in their respective documents included in Annexes 1 and 2.

<sup>4</sup> <https://www.gov.uk/guidance/the-cmas-programme-of-work-across-mobile-platforms>

<sup>5</sup> [Recent developments in relation to Apple's and Google's app store rules - GOV.UK](#)

## ***Next steps***

14. Apple and Google will implement the commitments on 1 April 2026.
15. We will engage with Apple and Google on their delivery of these commitments throughout this year, and on an ongoing basis during the designation period. We will also continue engaging with developers and other stakeholders on their experiences.
16. The first bi-annual reports from each of Apple and Google will cover the period of 1 April 2026 (1 January 2026 for Apple) to 30 June 2026 and the first annual reports will cover 1 April 2026 (1 January 2026 for Apple) to 31 December 2026. Subsequent reports on app certainty will then align with calendar years or half years as required. Apple's annual reports on interoperability will cover the period 1 July - 30 June each year. Some of this information will be reported publicly, and some confidentially to the CMA.<sup>6</sup>
17. We will publish regular updates on our monitoring efforts and views on compliance:
  - An initial update before the end of 2026 after receipt of the first bi-annual reports on all areas of the commitments, which Apple and Google will supply to the CMA by 30 September 2026;
  - A second update in the second quarter of 2027, after receipt of Apple's and Google's annual reporting on app review, app ranking and use of data and bi-annual reporting on interoperability from Apple, due by no later than 31 March of each year;
  - A third update before the end of 2027, after receipt of Apple's annual reporting on interoperability and bi-annual reporting on app review, app ranking and use of data by Apple and Google, due by no later than 30 September of each year; and
  - Subsequently, an annual report after receipt of Apple's and Google's bi-annual and annual reporting on all areas of the commitments.
18. We will move quickly to bring forward conduct requirements if these commitments are not adhered to or we find they are proving ineffective.

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<sup>6</sup> For detail, see Apple's and Google's final commitments at Annexes 1 and 2.

## ***The CMA's analysis of responses***

19. Stakeholder responses focused on the following key themes:

- Cross cutting comments
  - Commitments vs CRs
  - The mobile programme workplan
  - Monitoring
  - Guideline and policy changes
  - Non-retaliation safeguards
- Comments on specific aspects of the proposed commitments
  - App review
  - App ranking
  - Use of data
  - Interoperability (Apple)

### ***Cross cutting comments***

#### *Commitments vs CRs*

##### *Summary of responses*

20. The majority of respondents did not support the proposed introduction of commitments by Apple and Google in this area and called for the CMA to impose CRs at this stage instead. These respondents expressed:
- Questions in relation to the legal basis for the CMA's approach in these areas.
  - Concerns about the enforceability of commitments and implications for the digital markets competition regime.
  - That commitments could not have reasonably been expected in these areas.
  - Distrust in Apple's and Google's potential compliance with the proposed commitments including due to their past conduct across jurisdictions.

- That the proposed commitments do not sufficiently address stakeholder concerns regarding app review, app ranking, use of data and/or the approach to interoperability, leaving Apple and Google with too much discretion.
21. Several respondents said that the commitments are pragmatic and could deliver swift benefits.

*Our view*

22. We continue to consider that, in relation to these issues, resolving via commitments in the first instance is a swift and efficient way to deliver our intended outcomes, leading to immediate benefits for UK developers and mobile users.
23. As set out in our call for evidence, Apple and Google already have processes in place to ensure fair, transparent and objective app review, app ranking and use of data as well as to enable developers to raise requests for interoperability. We explained that the concerns we had heard related to a lack of transparency and trust in these processes. In this context, our focus is on codifying some of the existing processes and safeguards Apple and Google already have in place; and in some areas going further; as well as providing more transparency for developers in relation to these processes and safeguards, and ensuring that there are robust reporting mechanisms in place to enable monitoring. We consider that these measures can be effectively delivered through commitments, combined with robust regulatory oversight.
24. Apple and Google have committed to implementing these commitments immediately. We consider that action via this route will therefore lead to much swifter changes than if we were to proceed via CRs, with similar outcomes being achieved, and enables the CMA to free up resources to address other pressing issues with the potential to significantly benefit UK users and developers of mobile platforms.
25. With either route there is the potential for non-compliance and the tools we have available for monitoring, using our formal investigatory powers, are the same. We note that some respondents raised concerns about Apple's and Google's potential delivery of the commitments. We consider that the increased transparency and monitoring that these commitments require, together with use of the CMA's formal investigatory powers, including use of skilled person reports where appropriate, will ensure that Apple and Google are held to the standards they have committed to. Therefore, third parties should have far more certainty, and greater ability to verify, that Apple and Google are abiding by their commitments.

26. We recognise that the main drawback of a commitments approach compared to the use of CRs is lack of direct enforcement in the event of non-compliance. In considering commitments we have therefore thought carefully about the incentives Apple and Google have to comply. Whilst we are aware of concerns that respondents have raised about Apple's and Google's past conduct, we do consider that there are strong incentives in favour of compliance here, posed by the risk of detection of non-compliance by the CMA's oversight and increased transparency by Apple and Google, with the escalation option of imposing a CR.
27. Furthermore, we are well placed to take further action and move swiftly to impose CRs if the commitments are not observed or prove ineffective. If we were to seek to impose CRs, procedurally, we would first consult stakeholders on the design of the CR. In such a scenario, the commitments themselves and regular reporting from Apple and Google would provide valuable evidence to support our rationale and design considerations. Where the design of a CR is based on the commitments, we would therefore expect the process to be short.
28. We note that some consultation responses submitted that the legal basis for the CMA's approach in these areas is not clear. Our decision not to prioritise CRs at this stage in the areas addressed by the commitments arises in relation to our functions in section 19 of the Digital Markets, Competition and Consumers Act 2024 ('**DMCCA**') – the power to impose conduct requirements, as well as section 25 of the DMCCA – the duty to keep under review (among other things) whether to impose CRs in relation to a designated undertaking.<sup>7</sup> Proceeding on the basis of the commitments enables us to take a proportionate and targeted decision not to impose CRs in those areas, to focus resources on investigating potential CRs in other areas, and to keep the position under review going forwards.
29. We also note that some consultation responses submitted that commitments could not have reasonably been expected in these areas, given previous CMA statements made under the Mobile Platforms Strategic Market Status ('**SMS**') investigations (e.g. in the published Roadmaps). Under the DMCCA, taking account of the constantly evolving market and global, regulatory developments, we have been entrusted with discretionary powers to consider and continue to assess whether any interventions should be prioritised and, if so, which interventions and in what form. When we proposed changing our initial plan in relation to the areas covered by the commitments, we consulted

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<sup>7</sup> For the avoidance of doubt, Apple's and Google's commitments are not given in response to any action in the context of a Pro-Competition Intervention ('**PCI**') investigation or for any breaches of conduct requirements.

openly and transparently on those proposals with all market participants, giving them an opportunity to input and make submissions before a final decision is reached.

30. As set out in our Roadmaps, we are exploring formal interventions in a range of areas in relation to mobile platforms. However, where a firm chooses to offer commitments to address an issue, we will consider this carefully, recognising that commitments will not be appropriate to address concerns following an SMS designation in all circumstances. For example, we are unlikely to pursue commitments where there is significant divergence between us and a firm on what we are looking to achieve, where firms have little incentive to change their conduct, where compliance is difficult to determine, observe or monitor, where measures can be easily circumvented, or where an SMS firm's historical conduct does not give us confidence it will work constructively with us.

### *The mobile programme workplan*

#### *Summary of responses*

31. Many respondents highlighted a desire to see expedited action in the area of steering. Some of these said a steering CR is the most direct and effective way to shift platform incentives within the mobile ecosystem and deliver benefits for developers and consumers.
32. Some respondents stated that the CMA should prioritise alternative app distribution by requiring Apple and Google to permit competing app stores and/or sideloading without friction or discriminatory restrictions.
33. Other respondents raised browser choice and WebKit restrictions as an area of priority, including by noting that these constrain innovation and limit the development of new features. A few respondents said that an open and interoperable ecosystem of the Web including fair application programming interface ('**API**') access and browser-choice architecture interventions could stimulate greater competition in the mobile ecosystem, lead to lower costs for developers and higher quality for consumers.
34. Some respondents raised other areas in which the CMA should take prompt action including Apple's App Tracking Transparency (**ATT**); digital wallets and for Apple to provide developers with fair access to the Near Field Communication (**NFC**) chip; and interoperability for connected devices.

### *Our view*

35. This is only the first step in respect of our work on mobile platforms. As we set out in our recent programme update,<sup>8</sup> we plan to push forward with work this year on measures in other areas, including those emphasised by respondents:
- We are working on potential measures to address Apple’s and Google’s restrictions that prevent app developers from steering users outside of an app to complete a transaction. We have today published a first step on this work.<sup>9</sup> We expect to bring forward measures in this area in the first half of this year. We also continue to monitor international developments in respect of sideloading and third-party app stores.
  - We are working to understand how best to open up access to the functionality on Apple smartphones – the NFC chip – to enable third-party competitors to Apple Wallet. We will also update on our work in this area in the first half of this year.
  - Further priorities in this programme of work during 2026 include exploring work in relation to Apple on browsers and interoperable access to functionality for connected devices, as well as closely monitoring developments in relation to mobile platforms particularly the emergence and adoption of artificial intelligence (**AI**).
  - With regard to other issues raised by respondents, we are keeping other potential interventions under consideration.

### *Monitoring*

#### *Summary of responses*

36. Some respondents noted concerns about the CMA’s approach to monitoring Apple’s and Google’s compliance with their proposed commitments:
- Several respondents noted the importance of increased transparency on metrics and measurement of outcomes.

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<sup>8</sup> <https://www.gov.uk/guidance/the-cmas-programme-of-work-across-mobile-platforms>

<sup>9</sup> <https://www.gov.uk/government/calls-for-evidence/recent-developments-in-relation-to-apples-and-googles-app-store-rules>

- Some respondents said that they would welcome further clarity on how the CMA intends to share insights from confidential reporting and whether any confidential metrics could instead be made public.
  - Some respondents stated that the CMA should conduct an independent audit and/or independent oversight is required to monitor compliance with one or more of the proposed commitments.
  - A few respondents noted concerns with Apple's and Google's self-attestation of compliance.
37. Some respondents noted that the CMA's approach to monitoring compliance is appropriate in principle.

*Our view*

38. We previously set out our approach to monitoring the delivery and effectiveness of Apple's and Google's commitments:
- Firstly, Apple and Google will provide mechanisms for developers to raise concerns and will report on these. Complaints will serve as a useful barometer for whether the commitments have been implemented appropriately and working effectively.
  - Secondly, enhanced public reporting by Apple and Google will provide transparency on how they are delivering against their respective commitments.
  - Thirdly, Apple and Google will each report on a substantial number of additional metrics to the CMA on a regular and confidential basis to allow us to further scrutinise and oversee delivery.
  - Fourthly, we can use our information gathering powers under the DMCCA to gather further information, if necessary.
39. Taken together, this approach enables ongoing oversight of Apple's and Google's conduct while remaining proportionate and flexible.
40. We note some respondents' views that Apple and Google should report more metrics publicly. Apple has updated its final commitments to include additional public reporting on the percentage of app reviews completed within 4 days and the percentage of appeals completed within 60 days. Google has updated its final commitments to include additional public reporting on the median, 99<sup>th</sup> percentile and average time taken for app review globally, as well the median time needed to action a complaint. Public reporting is, however, just one

element to monitoring and we consider that it is the sum of the four limbs that will provide an informed picture of Apple's and Google's delivery.

41. In respect of comments seeking clarity on how the CMA would share insights from confidential reporting, we will publish regular updates on our monitoring work.<sup>10</sup> Building on the bi-annual and annual reporting that Apple and Google will supply to the CMA, we will be able to detect potential compliance issues promptly and assess whether the commitments are working in practice. Our regular updates will confirm our view on compliance at the time, and any particular areas of focus.
42. We also note respondents' views that there should be an independent audit of Apple's and Google's reporting. The CMA's oversight of Apple's and Google's commitments will provide for independent scrutiny. In support of this, where deemed appropriate, the CMA has the power to compel additional information through its section 69 information gathering powers under the DMCCA to further investigate areas of potential concerns. For example, the CMA could require a demonstration of the app ranking algorithm. The CMA has further powers under section 79 whereby it can appoint a skilled person to report to us on a matter in cases of suspected non-compliance. We will consider an appropriate use of these powers in the event of non-compliance with these commitments.

### *Guideline and policy changes*

#### *Summary of responses*

43. A few respondents raised cross cutting comments in respect of changes to policies and guidelines, including notice and grace periods, consultation with developers and querying what constitutes a 'major' change:
  - A number of respondents noted concerns regarding the clarity and length of the notice period Apple and Google commit to give to developers ahead of material changes to app store guidelines. They submitted that notice periods should be long enough to allow developers to adapt to changes, with some stating that, at a minimum, they should match Apple's and Google's obligations under the Platform to Business ('**P2B**') Regulations requiring them to provide at least 15 days' notice for any changes to terms and conditions governing access to online intermediation services.

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<sup>10</sup> See paragraph 17 for more detail on the frequency of updates.

- One respondent noted that it is Apple who ultimately determines what constitutes a ‘major’ change in relation to the inputs used in its search algorithm or presentation of search results meaning developers could potentially not be given notice ahead of certain changes.
- One respondent stated that developers should be given a longer ‘grace period’ before their apps are removed from app stores if they are non-compliant.
- A few respondents noted that Apple and Google should engage in meaningful consultation with developers when they are considering policy changes that may have a significant commercial impact.

### *Our view*

44. We recognise the legitimate need of developers to be able to influence policy changes which might impact them, and to prepare for these. At the same time, we also recognise that there are some circumstances in which Apple and Google may need to make immediate changes to policies, for example in response to security issues, and in these circumstances, consulting and/or providing notice may not be appropriate.
45. Based on our discussions with Apple and Google, we understand their general approach is therefore to rely on grace periods to provide for a time where developers can provide feedback on announced changes, and make the necessary changes to their apps. For example, Apple announced age ratings for all apps and games on the App Store in July 2025, but provided developers until 31 January 2026 to come into compliance with the Guideline changes.<sup>11</sup> In the final commitments, both Apple and Google set out that they will provide developers adequate time to come into compliance with relevant Guideline changes and where appropriate provide tailored grace periods between announcements and changes becoming effective. We consider that this should give developers reassurance that they will have sufficient time to adapt to changes to the guidelines and raise concerns before they take effect.
46. In relation to the clarity and length of the notice periods provided by Apple and Google ahead of material changes to app store guidelines, the commitments build on any existing obligations on Apple and Google. Google has clarified in the commitments that in giving reasonable notice, it will do so in compliance with applicable legislation including the P2B Regulation. Apple has added in a

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<sup>11</sup> [Updated age ratings in App Store Connect - Latest News - Apple Developer](#)

footnote that it is cognisant of its broader obligations under P2B Regulations, and that it takes account of these in its operation of the App Store.

47. We note the view that it is left up to Apple to determine what constitutes a 'major change.' We consider major changes are those which have material implications for developers. We would not expect Apple or Google to provide notice of small clarificatory changes.
48. In respect of feedback that Apple and Google should consult developers ahead of major changes to policies, as above, we consider that an appropriate balance would involve Apple and Google committing to actively engage with affected developers to ensure that any potential disruption is minimised, providing notice periods ahead of policy changes where appropriate, and also ensuring that apps have a sufficient grace period where feedback can be raised and are not removed from app stores without sufficient warnings and discussions with Apple and Google.

### *Non-retaliation safeguards*

#### *Summary of responses*

49. A few respondents said that Apple's and Google's commitments should include explicit non-retaliation safeguards for developers that complain, publicly criticise, or engage with regulators, noting this is essential for businesses to engage without fear of adverse treatment.

#### *Our view*

50. Developers and other stakeholders should be able to engage with regulators and complain to Apple and Google without fear of retaliation or adverse treatment by either firm. Both Apple and Google explicitly acknowledge that this principle applies to all aspects of these commitments, and upon further engagement with the CMA, have added text in the final commitments to reflect this.

### ***Comments on specific aspects of the proposed commitments***

#### *App review*

#### *Summary of responses*

51. Several respondents outlined areas where they thought that Apple's and Google's commitments in relation to App Review should go further:

- Some respondents said that Google does not commit to a target timeline for the review of apps or app updates. Some respondents also stated that Google should commit to publishing data against such a target, including one suggestion for average and median times taken to review submissions.
- A few respondents noted Apple's commitment to review 90% of submissions within 24 hours left uncertainty for the remaining 10% of apps. Concerns included that this could risk submissions being held in review indefinitely and that this could negatively impact new apps and publishers in particular.
- A few respondents noted that both Apple's and Google's commitments do not include a defined target timeframe for internal appeals and lack public reporting on this.

### *Our view*

52. When we published Apple's and Google's proposed commitments for views, we highlighted the discrepancy between Apple and Google on target timelines for App Review and associated public reporting. We consider that this is critical for giving developers greater certainty and to support their planning. Public reporting against this target also provides greater public transparency and reassurance. We have continued to discuss this with Google who has now committed to enhanced public reporting on an annual basis on the median, 99<sup>th</sup> percentile and average time taken for app review globally. We consider that this will provide developers with a rounded understanding of Google's app review timelines. In addition, we will also further interrogate app review timelines via confidential reporting that Google has committed to provide to the CMA on a bi-annual basis.
53. We note comments about the uncertainty left for the remaining 10% of apps not captured by Apple's target to review 90% of apps in 24 hours. We consider that setting a specific target for these 10% of apps could have unintended consequences by rushing decisions, when circumstances may warrant longer consideration for this small set of more complex activities. We will be closely monitoring the types of apps for which review takes longer than 24 hours. Furthermore, Apple has now committed to provide additional public reporting on the percentage of App Reviews completed within 4 days. As above, Google has now committed to reporting on the time taken to complete 99% of app reviews. We will stand ready to use our formal information gathering powers if necessary to supplement our understanding including to better understand the circumstances for apps that take significantly longer to review than others.

54. In relation to comments about the timeline for internal appeals, we understand that internal appeals can be fact specific, represent a relatively small subset of overall submissions, and require more substantial input from developers to be resolved adequately. For these reasons, we do not currently consider it appropriate for Apple and Google to set explicit timelines for their internal appeals processes. Google has, however, committed to report publicly on the median time needed to action complaints. Apple has committed to publishing annual metrics for UK-based app developers on the percentage of appeals completed within 60 days. Coupled with our oversight and confidential reporting on appeals, we would expect these measures will provide developers with increased transparency and help ensure that internal appeals are handled in a timely and fair manner.

### *App ranking*

#### *Summary of responses*

55. Some respondents raised concerns on the scope and details of the app ranking commitments:
- Some respondents noted that Apple and Google should explicitly commit to not preferencing apps that are likely to yield more fees to them or apps that use their business-to-business (**B2B**) services.
  - Some respondents said that Google commits to a fair selection of featured and editorial content whilst Apple does not and one queried how the CMA will monitor this selection process.
  - A few respondents stated they would welcome more clarity on how ranking decisions are determined and on algorithmic signals and weights, with one noting that the commitments still provide leeway for Apple and Google to produce desired results.

#### *Our view*

56. Regarding calls for Apple and Google to commit to not preference apps that are likely to yield more fees to them, or apps that use their B2B services, we note that Apple and Google already committed not to self-preference first party apps and to rank on a fair, objective and non-discriminatory basis. In response, Apple has clarified this commitment further noting that it will not preference Apple's first-party apps or unfairly disadvantage third-party apps. Google has added a footnote to clarify that it will not preference the ranking of an app solely due to the app likely generating additional revenue for Google.

57. In respect of featured and editorial content and the lack of commitments in this respect by Apple, as outlined in our Roadmap<sup>12</sup> our focus has been on ensuring that Apple and Google provide app developers with increased confidence and certainty as to how their apps are ranked in response to organic searches and to have fair opportunities to reach consumers. While Google's commitment in this respect is welcome, and we would expect Apple to also rank featured and editorial content fairly, at this time, we consider this to be outside the scope of organic searches.
58. We note stakeholders' asks for greater clarity on ranking decisions, signals and weights. We understand that there is a balance to strike around public transparency in this area, as this could risk gaming of the algorithm by malicious actors and undermine the fairness of the ranking processes. However, Apple and Google have both committed to report confidentially to the CMA on signals and weights, and the CMA could require a demonstration of the app ranking algorithm using its section 69 information gathering powers, where appropriate.

### *Use of data*

#### *Summary of responses*

59. Several respondents outlined areas where Apple's and Google's commitments in relation to their use of data could go further:
- Some respondents stated Apple should commit to expanding its safeguards to cover data that Apple receives by virtue of running the App Store, rather than limiting these to data collected during app review. One respondent stated that the commitments should be broadened to cover all data collected through the operation of Apple's and Google's mobile platforms.
  - Some respondents stated that Apple and Google should commit to give developers the right to access data they hold relating to developers own apps for transparency and accountability.
  - One respondent stated Apple and Google should commit to self-report to the CMA upon discovery of a breach, where third-party data was accessed for competitive purposes.

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<sup>12</sup> [Roadmap \(Apple\)](#)

### *Our view*

60. We note views that Apple's safeguards should extend to cover data it holds by virtue of running the App Store. In response to this feedback, Apple has updated its final commitments to include this. We do not, at this time, consider expanding the scope of the commitments to cover other data types to be appropriate as the concerns we identified in this area were focused on transparency in respect of data Apple and Google hold in the context of their respective app stores.
61. In relation to Apple and Google providing developers with the right to access data relating to their own apps, we note respondents' views that this could aid transparency and accountability. However, we do not consider that an intervention that seeks to facilitate this would address the concern we have identified in this area, namely the risk of Apple and Google misusing developers' data for their own commercial purposes.
62. We have engaged with Apple and Google regarding self-reporting to the CMA on discovery of a breach. Apple and Google have both agreed to more prompt confidential reporting to the CMA in the event that they identify that third-party data was accessed for competitive purposes. We will monitor breaches for both firms and should we identify concerning behaviour by either firm, we can use our powers to require further information or require a skilled person's report to better understand what is enabling such breaches.

### *Interoperability (Apple)*

#### *Summary of responses*

63. The large majority of respondents who commented on Apple's proposed commitments regarding the interoperability request process – in particular individuals and small developers – were concerned that these would not ensure meaningful interoperability and would enable Apple to deny interoperability requests on a discretionary basis. Some respondents called on the CMA to mandate a general default interoperability requirement and/or to provide access to interoperability solutions for free.
64. Some respondents stated that the level of detail that would be provided to Eligible Developers who contact Apple about their request while it is progressing through the internal queue, as well as the timeline for such updates, are unclear. These respondents also said that Apple should clarify what information would be included in the reasoning provided for rejected requests.

65. Many respondents noted that analysing third-party interoperability requests against Apple's criterion of 'alignment with Apple's platform priorities' is vague, as the platform priorities are not public and may evolve over time without notice. Some respondents were also concerned that this could allow Apple to deny requests without good reasons. Respondents also said that it is unclear how Apple will determine 'expected user and developer uptake' as part of the assessment criteria.
66. Some respondents stated that the scope of interoperability requests that would be considered eligible under Apple's process is unclear and said that it should extend to include access to functionality that already exists but is not used by Apple's own services or hardware.
67. Some respondents noted that the majority of developers that provide apps and services in the UK would be excluded from submitting requests, as their account memberships are unlikely to be registered in the UK and would therefore not meet the eligibility criteria. A few respondents also said that differing approaches to interoperability between jurisdictions create complexity for developers seeking to scale their products and services.
68. Other comments included that Apple should commit to assessing interoperability requests within binding timeframes. Some respondents noted that Apple should commit to establishing an independent appeals mechanism for rejected requests.
69. A few respondents stated that Apple's interoperability commitments would improve transparency for third-party developers while ensuring that Apple's incentives to innovate are maintained.

#### *Our view*

70. We have been clear that the aim of our work in this area is not to create a default interoperability requirement, but rather to ensure that Apple fairly and objectively considers requests from app developers for interoperable access to features within its iOS and iPadOS operating systems, and does so in a timely manner. We think that the commitments are likely to be effective in achieving this aim as developers will have access to a more structured and transparent process for submitting interoperability requests. We will closely monitor the delivery and effectiveness of Apple's commitments, including via confidential reporting metrics supplied by Apple. If information from the request process demonstrates that Apple is routinely declining interoperability requests without good reasons, this will inform our pipeline of wider work, and we will consider whether there is a need for specific targeted interoperability measures. For example, we are already exploring potential interoperability

interventions in respect of digital wallets, connected devices, and mobile browsers. We consider that an approach that focuses on enabling interoperability for functionalities in iOS and iPadOS for key use cases can deliver targeted, effective and proportionate interventions that are in line with our overall approach to the digital markets competition regime.

71. We also do not consider it appropriate to set a blanket requirement that all interoperability that Apple provides is necessarily provided free of charge. When designing any potential interventions, the CMA must ensure that its actions are proportionate to its aim. Our intended approach would be to assess any concerns about the level of fees being charged on a case-by-case basis to reflect the relevant underlying facts.
72. We note comments that Apple should provide greater clarity about the level of detail that will be provided to developers who contact Apple about their requests while they are progressing through the internal queue, as well as the timeline for such updates. Apple has agreed to endeavour to respond to such requests within two weeks of receiving them. Apple will also provide developers with an update on the status of their requests within four weeks of receiving them and in terms of level of detail, will indicate whether the developers' requests have been deemed eligible for further consideration as part of Apple's software planning process.
73. We note comments that Apple should provide greater clarity on what information it will include in the reasoning provided for rejected requests. Apple's final commitments include a requirement that it will explain how it applied the assessment criteria in its reasoning for rejected requests.
74. We have engaged extensively with Apple on the criteria for assessing interoperability requests. We acknowledge the uncertainty stakeholders expressed with respect to the 'alignment with Apple's platform priorities' criterion. Apple has added some additional detail to clarify that this criterion refers to the broad set of features and functionalities that Apple decides to prioritise or not for the year. We consider it reasonable that Apple keeps its roadmap for feature development confidential as it may contain legitimate business secrets. However, Apple's commitment to explain in any rejected requests how it applied the assessment criteria, coupled with our close monitoring, will help us understand how the criterion is applied in practice. Furthermore, if we consider that there are specific areas where interoperability is likely to deliver wider benefits, for example by unlocking innovation, then, as set out above, we may choose to impose specific interoperability requirements in these areas.

75. We note comments that Apple should clarify how it will determine ‘expected user and developer uptake’ as part of the assessment criteria. Apple has updated its final commitments to clarify that, for example, in determining this criterion it would take into account the number of developers that have requested the relevant feature or functionality. We note that Apple’s annual transparency report will include key performance indicators relating to eligible requests, including the most requested functionalities.
76. We note comments that Apple should clarify the scope of requests that would be eligible under the feedback channel to include requests for access to functionality that already exists but is not used by Apple’s own services or hardware. We do not consider, at this time, that expanding the scope of eligible requests is appropriate. Even where functionality already exists technically, if it is currently unused then making it into a product which is fit for purpose, including for access by third parties, would likely require materially more work and costs for Apple than a pre-existing solution which it already uses.
77. While we can see the broader benefits in global coherence, we are also needing to balance this against our focus on delivering for UK business and consumers:
- Regarding comments that restricting the feedback channel to developers with UK-registered Apple Developer accounts would exclude the majority of developers that provide apps and services in the UK. We note that Apple is implementing the interoperability feedback channel on a worldwide basis, thus extending access to the interoperability request process to all developers with a registered Apple Developer account. Apple will review requests in the order that they are received in, irrespective of the country in which the developer is registered.<sup>13</sup>
  - We acknowledge respondents’ views that differing approaches to interoperability between jurisdictions may create additional complexity for developers seeking to scale their products and services. We have decided to proceed on the basis of Apple’s commitments because they are the swiftest and most pragmatic means by which to address transparency and certainty concerns regarding interoperability requests in line with the principles set by the UK’s digital markets competition regime. We will continue to monitor coherence with our work and related work in other jurisdictions.

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<sup>13</sup> The feedback channel is available on Apple’s website at: [Interoperability requests - Support - Apple Developer](#).

78. We note comments that Apple should commit to assessing requests within binding timeframes. Given the range of interoperability requests Apple may receive, we consider that standardised timeframes could have unintended consequences for example where more thorough investigation may be required or beneficial. We consider that the timeframes Apple has committed to observe to respond to requests for updates would allow developers to stay readily informed about their requests and progress through the process. We will also closely monitor whether requests are reviewed in a timely manner through Apple’s confidential reporting to the CMA, which will include statistics on review times for eligible and ineligible requests.
79. We note comments calling for Apple to establish an independent appeals mechanism for rejected requests. We do not consider that mandating an independent appeals mechanism would be appropriate at this time. We will closely monitor requests and rejections through Apple’s reporting to understand whether requests are being rejected without good reason and will consider more targeted interventions where appropriate.

### **Conclusion**

80. The CMA has decided not to prioritise CRs in this area at this time. Apple and Google will implement the commitments on 1 April 2026.
81. We will engage with Apple and Google on their delivery of these commitments throughout this year, and on an ongoing basis. We will also continue engaging with developers and other stakeholders on their experiences.
82. The first bi-annual reports from each of Apple and Google will cover the period of 1 April 2026 (1 January 2026 for Apple) to 30 June 2026 and the first annual reports will cover 1 April 2026 (1 January 2026 for Apple) to 31 December 2026. Subsequent reports on app certainty will then align with calendar years or half years as required. Apple’s annual reports on interoperability will cover the period 1 July - 30 June each year. Some of this information will be reported publicly, and some confidentially to the CMA.<sup>14</sup>
83. We will publish regular updates on our monitoring efforts and views on compliance:
- An initial update before the end of 2026 after receipt of the first bi-annual reports on all areas of the commitments, which Apple and Google will supply to the CMA by 30 September 2026;

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<sup>14</sup> For detail, see Apple’s and Google’s final commitments at Annexes 1 and 2.

- A second update in the second quarter of 2027, after receipt of Apple's and Google's annual reporting on app review, app ranking and use of data and bi-annual reporting on interoperability from Apple, due by no later than 31 March of each year;
  - A third update before the end of 2027, after receipt of Apple's annual reporting on interoperability and bi-annual reporting on app review, app ranking and use of data by Apple and Google, due by no later than 30 September of each year; and
  - Subsequently, an annual report after receipt of Apple's and Google's bi-annual and annual reporting on all areas of the commitments.
84. We will move quickly to bring forward conduct requirements if these commitments are not adhered to or we find they are proving ineffective.
85. This is only the first step in respect of our work on mobile platforms - we plan to push forward with work this year in respect of steering, digital wallets, browsers, and connected devices.