

NOTICE UNDER SECTION 84(3) OF THE DIGITAL MARKETS, COMPETITION AND CONSUMERS ACT 2024 (THE ACT)

1. On 3 June 2026 the Competition and Markets Authority (the **CMA**) imposed the Publisher Conduct Requirement on Google relating to its general search services.¹ The CMA hereby gives notice under section 84(3) of the Act of Google's compliance and reporting obligations in respect of the Publisher Conduct Requirement.
2. Part 1 of this Notice sets out Google's reporting obligations including:
 - (a) the manner and form of the compliance report to be provided in relation to the Publisher Conduct Requirement; and
 - (b) the contents of the compliance report to be provided in relation to the Publisher Conduct Requirement.
3. Part 2 of this Notice sets out relevant administrative information including:
 - (a) the reporting periods for the Publisher Conduct Requirement;
 - (b) the CMA's expectations in relation to the publication of compliance reports for the Publisher Conduct Requirement; and
 - (c) the CMA's expectations in relation to the implementation period for the Publisher Conduct Requirement.
4. The CMA will publish a copy of this Notice on its website in accordance with the [Digital Markets Competition Regime Guidance](#) (the **Guidance**).²

¹ See the Publisher Conduct Requirement Notice, available on the [CR page](#) and can also be accessed via the [case page](#).

² See paragraph 6.47 of the Guidance.

PART 1: REPORTING OBLIGATIONS

Manner and form of the compliance report

5. For each reporting period set out in Part 2, Google should prepare and submit a written report (a **compliance report**) to the CMA that provides the information set out below.
6. A Nominated Officer must be appointed by Google in relation to each digital markets requirement, which includes a conduct requirement, to which it is subject, including the Publisher Conduct Requirement. The Nominated Officer is responsible for, amongst other things, monitoring Google's compliance with its digital markets requirements and securing that Google complies with respective compliance reporting requirements.³
7. We expect Google to notify the CMA of the identity of the Nominated Officer appointed in relation to the Publisher Conduct Requirement within the first month of receiving this notice. When notifying the CMA, Google should explain how the appointment meets the requirements of the Nominated Officer role set out in the Act and Guidance.⁴
8. The Nominated Officer appointed by Google in relation to the Publisher Conduct Requirement shall submit compliance reports via email to searchsms@cma.gov.uk.

Contents of compliance reports

9. Each of Google's compliance reports should include, as a minimum, the information set out below.

Assessment of compliance

10. A comprehensive explanation of the extent to which the Nominated Officer considers that Google has complied with the Publisher Conduct Requirement during the relevant period. This explanation should include any relevant supporting data and internal documents. This explanation must enable the CMA to verify whether Google has complied with the Publisher Conduct Requirement and should include a description of:
 - (a) how Google has complied with the Publisher Conduct Requirement including
 - (i) any changes Google has made during the reporting period; and
 - (ii) any

³ See section 83 of the Act.

⁴ See section 83 of the Act and paragraphs 6.27-6.38 of the Guidance for further information on the role and responsibilities of the Nominated Officer.

existing practices in place prior to the reporting period and / or the Publisher Conduct Requirement coming into force which ensure Google's compliance;

- (b) the extent to which Google has applied the CMA's interpretation of the Publisher Conduct Requirement as set out in the Interpretative Notes; and
- (c) how Google has assessed its compliance with the Publisher Conduct Requirement during the reporting period, including whether any internal or external audits have been carried out. As part of this, Google should provide the details of any such audits including their methodology and results.

11. In respect of the paragraphs 3 to 5 and 9 of the Publisher Conduct Requirement, Google should, as a minimum, provide:

- (a) an explanation of:
 - (i) each of the controls Google has provided to publishers during the reporting period to enable them to withhold their Search Content from being used in generative AI services and features including:
 - (1) the scope, function, granularity and technical basis of each control offered;
 - (2) how each control is made available to publishers and any steps Google has taken to inform publishers of the controls available;
 - (3) in respect of controls relating to its search generative AI features (paragraphs 3.b. and 4 of the Publisher Conduct Requirement) how Google has ensured those controls enable publishers to effectively and efficiently withhold their Search Content from being used in the grounding of search generative AI features at directory-level and page-level;
 - (ii) any changes to Google's existing generative AI services and features during the reporting period and the extent to which this resulted in Google making changes to the controls offered to publishers set out in response to (a)(i) above;
 - (iii) any new generative AI services and features Google has developed or released during the reporting period and how the controls set out in response to (a)(i) above apply to each such service and feature, including an explanation of any updates Google has made to its controls to extend them to cover each new service or feature;
 - (iv) any new or updated controls Google is developing or planning to implement for publishers in future reporting periods;

- (v) the steps Google has taken during the reporting period to ensure each of the controls set out in response to (a)(i) above functions as intended and described to publishers (for example through adversarial testing);
 - (vi) any contributions Google has made during the reporting period to the development of industry standards for controls similar to those set out in response to (a)(i) above; and
 - (vii) the steps Google has taken during the reporting period to ensure it has not circumvented any publisher's choice to withhold its Search Content by acquiring that Search Content through other sources;
- (b) data on publishers' use of each of the controls Google has provided under paragraph (a)(i) above (eg the number of publishers exercising the control; the number of pages/ sites to which the control has been applied); and
 - (c) an explanation of the steps Google has taken during the reporting period to ensure publishers are not prevented from – or penalised for – using the controls pursuant to paragraph 9 of the Publisher Conduct Requirement.
12. In respect of paragraphs 6 and 7 of the Publisher Conduct Requirement, Google should, as a minimum, provide:
- (a) copies of all versions of the Explanatory Information published by Google during the reporting period pursuant to paragraph 6;
 - (b) an explanation of:
 - (i) the Explanatory Information published by Google during the reporting period pursuant to paragraph 6 of the Publisher Conduct Requirement;
 - (ii) any updates or changes made to the Explanatory Information versions provided in response to (a) above during the reporting period;
 - (iii) how the Explanatory Information versions provided in response to (a) above were made available to publishers during the reporting period;
 - (iv) any commercial information Google has excluded from the Explanatory Information versions provided in response to (a) above during the reporting period on the basis that its disclosure might significantly harm Google's legitimate business interests; and
 - (v) the metrics provided to publishers pursuant to paragraph 7 of the Publisher Conduct Requirement during the reporting period including:

- (1) a list and description of all the metrics made available to publishers including the format and basis that the data is provided (eg level of aggregation);
- (2) any changes made to the metrics made available during the reporting period and the reasons for those changes;
- (3) how the metrics are provided to publishers (eg the platform where they are made accessible); and
- (4) how the metrics provided enable publishers to take informed decisions.

13. In respect of paragraph 8 of the Publisher Conduct Requirement, Google should, as a minimum, provide:

- (a) an explanation of the steps Google has taken during the reporting period to ensure that Search Content in search generative AI features is attributed clearly, accurately and that end users are provided with a clear means to access that Search Content including:
 - (i) a detailed description of Google's approach to the attribution of Search Content in its search generative AI features;
 - (ii) any changes Google has made during the reporting period to its approach to attribution of Search Content in search generative AI features;
- (b) copies of all versions of the Explanatory Information Google has published during the reporting period pursuant to paragraph 8.b. of the Publisher Conduct Requirement including any updates or changes made to the Explanatory Information during the period;
- (c) an explanation of:
 - (i) the Explanatory Information published by Google during the reporting period pursuant to paragraph 8.b. of the Publisher Conduct Requirement;
 - (ii) any updates or changes made to the Explanatory Information versions provided in response to (b) above during the reporting period;
 - (iii) how the Explanatory Information provided in response to (b) above was made available to publishers during the reporting period; and
 - (iv) any commercial information Google has excluded from the Explanatory Information provided in response to (b) above on the basis that its

disclosure might significantly harm Google's legitimate business interests.

14. As set out in Part 2 below, the first reporting period includes the implementation period and the first day of the Publisher Conduct Requirement coming into force. The compliance report for this first reporting period should therefore, in so far as is relevant, set out the information above in respect of Google's compliance with the Publisher Conduct Requirement as of the first day it comes into force including any steps taken during the implementation period to ensure compliance on day one.

Details of general engagement with third parties

15. A summary of the engagement Google has had with any third parties during the reporting period in respect of:
 - (a) Google's development and implementation of any changes to comply with the Publisher Conduct Requirement including the details of any consultation that was carried out with end users or business users in respect of any changes; and
 - (b) any compliance concerns raised by third parties relating to Google's application of the Publisher Conduct Requirement, including steps taken to investigate concerns raised by third parties, the conclusion of such investigations, and details of any follow-up actions taken.

Declaration of completeness and accuracy

16. The compliance report must include a declaration from the Nominated Officer that they have taken reasonable steps to satisfy themselves that the information contained in the compliance report is complete and accurate.

PART 2: ADMINISTRATIVE INFORMATION

Reporting periods

17. The first two compliance reports should cover six-month periods and be submitted to the CMA no later than one month after the end of the reporting period.
18. Thereafter compliance reports should cover 12-month periods and be submitted to the CMA no longer than one month after the end of the reporting period.

Schedule of compliance reports

Reporting Period	Report Due Date
3 June 2026 – 3 December 2026	3 January 2027
4 December 2026 – 3 June 2027	3 July 2027
4 June 2027 – 3 June 2028	3 July 2028
Repeating annually thereafter as long as the Publisher Conduct Requirement remains in effect.	

Publication of compliance reports

19. Following receipt of a compliance report, the CMA expects to issue a subsequent notice in accordance with section 84(5) of the Act requiring Google to publish a summary and / or non-confidential version. The notice will specify the scope of information Google is required include in the public version of the report and require Google to make the public version of the report available on Google’s website in a clear, accessible position to third parties.

Implementation period

20. In accordance with the approach set out in the Guidance, the CMA expects Google to work constructively with the CMA during the implementation period of the Publisher Conduct Requirement to assist the CMA to understand Google’s compliance plan.⁵ As set out in the Publisher CR Final Decision, a non-confidential version of which is available via the [CR page](#), the CMA therefore expects Google to provide a written plan to the CMA on how it intends to comply with the Publisher Conduct Requirement within one month of receiving this notice.⁶

Version control

21. In accordance with section 84(4) of the Act, the CMA may amend the requirements specified in this notice by giving a further notice to Google.

Version	Date
1	June 2026

Competition and Markets Authority

3 June 2026

⁵ See paragraph 3.69 of the Guidance.

⁶ See paragraph 3.41 of the Publisher CR Final Decision.