

NOTICE UNDER SECTION 19(1) OF THE DIGITAL MARKETS, COMPETITION AND CONSUMERS ACT 2024 (THE ACT)

On 10 October 2025, the Competition and Markets Authority (**CMA**) published its decision to designate Google as having strategic market status (**SMS**) in respect of general search services.¹ The CMA hereby gives notice under section 19(1) of the Act that it is imposing a conduct requirement (the **Publisher Conduct Requirement**) on Google relating to its general search services.

This Notice sets out the matters in respect of the Publisher Conduct Requirement required by section 21 of the Act.

The Publisher Conduct Requirement

Definitions

1. For the purposes of this conduct requirement:
 - a. **broader generative AI services** means Google's generative AI-dependent products and services offered outside of general search, such as Gemini AI Assistant and the Vertex AI API, and the models used to generate responses in them.
 - b. **Explanatory Information** means information provided by Google to publishers that is clear, comprehensible and presented in a user-friendly format as far as possible, to assist publishers in making decisions about whether to exercise the controls described in paragraph 3.
 - c. **general search** has the meaning given to it in the SMS Decision Notice dated 10 October 2025, as revised from time to time.
 - d. **generative AI services and features** means Google's search generative AI features and broader generative AI services, together.
 - e. **publisher** means any party that makes content available on the web.
 - f. **Search Content** means publisher content collected through Googlebot or any Google crawler fulfilling the function of crawling open web content for Google's general search.
 - g. **search generative AI features** means Google's generative AI-dependent features offered within general search, such as AI Overviews and AI Mode, and the models used to generate responses in them.

¹ See the [SMS Decision Notice](#) for the descriptions of the designated undertaking and relevant digital activity.

Scope

2. The obligations in paragraphs 3 to 8 shall apply in relation to the outputs of all generative AI services and features shown to any natural or legal persons located in the UK.

Controls

3. Google shall provide publishers with effective controls to withhold their Search Content from being used in generative AI services and features. Such controls shall cover the training and grounding of:
 - a. its broader generative AI services; and
 - b. its search generative AI features.
4. Google shall ensure that the controls described in paragraph 3.b. enable publishers effectively and efficiently to withhold their Search Content from being used in the grounding of search generative AI features at:
 - a. directory-level; and
 - b. page-level.
5. In relation to the controls described in paragraph 3, Google:
 - a. shall ensure that those controls evolve in an appropriate way as Google's generative AI services and features evolve; and
 - b. shall not attempt to circumvent any publisher's choice to withhold its Search Content by acquiring that Search Content through other sources.

Transparency

6. Google shall publish Explanatory Information on:
 - a. how Search Content is used for the training and grounding of its generative AI services and features; and
 - b. the effect and scope of the controls described in paragraph 3.
7. Google shall provide publishers with clear and detailed metrics on user engagement with their Search Content where it is used in its search generative AI features.

Attribution

8. Google shall:
 - a. take reasonable steps 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, taking account of the need for such attribution to also reflect broader end-user experience, design aesthetics and source diversity; and
 - b. publish Explanatory Information explaining the steps it takes to:
 - i. meet the requirement set out in paragraph 8.a.; and
 - ii. ensure and measure the factuality of search generative AI features.

Anti-retaliation

9. Google shall not seek to prevent publishers from, or penalise them for, using the controls described in paragraph 3, for example by downranking their Search Content, or otherwise disadvantaging them, relative to opted-in Search Content, in general search outside of search generative AI features.

1. The Interpretative Notes accompanying this Notice provide information about the CMA's interpretation of the Publisher Conduct Requirement. It is open to Google to take a different approach where it is able to demonstrate to the CMA that its approach complies with the terms of the Publisher Conduct Requirement.

The CMA's reasons for imposing the Publisher Conduct Requirement

2. The reasons for the CMA's decision to impose the Publisher Conduct Requirement are set out in the Publisher CR Final Decision, a non-confidential version of which is available via the [CR page](#).

Statutory objectives

3. The CMA considers it proportionate to impose the Publisher Conduct Requirement for the purposes of the fair dealing objective and the trust and transparency objective in sections 19(6) and 19(8) of the Act.

Permitted types

4. The Publisher Conduct Requirement is for the purpose of:
 - (a) section 20(3)(d) of the Act: preventing Google from requiring or incentivising publishers to use its generative AI services and features alongside its traditional search engine (Google Search) – see paragraphs 3 to 5 and 9 of the Publisher Conduct Requirement;
 - (b) section 20(2)(c) of the Act: obliging Google to provide clear, relevant, accurate and accessible information to publishers about general search services: in particular, how their content, collected for the purpose of general search, is used, attributed and engaged with – see paragraphs 6 to 8 of the Publisher Conduct Requirement; and
 - (c) section 20(2)(e) of the Act: obliging Google to present to publishers any options or default settings in relation to general search services in a way that allows publishers to make informed and effective decisions in their own best interests about those options or settings – see paragraph 6 of the Publisher Conduct Requirement.

Benefits of imposing the Publisher Conduct Requirement

5. The benefits that the CMA considers would likely result from the Publisher Conduct Requirement are set out in the Publisher CR Final Decision, a non-confidential version of which is available via the [CR page](#).

Implementation and term of the Publisher Conduct Requirement

6. The Publisher Conduct Requirement will come into force six months after the date of this Notice, with the exception of paragraph 4.b. of the Publisher Conduct Requirement, which will come into force nine months after the date of this Notice.
7. As set out in the SMS Decision Notice, the last day of the designation period for the designation to which the Publisher Conduct Requirement relates is 10 October 2030, subject to the provisions in the Act for extension of that period and revocation of the SMS designation.
8. This Notice shall continue in force until 10 October 2030 or until such time as it is varied under section 19(2) of the Act or revoked under section 22(2) of the Act. Any variation or revocation shall not affect the validity or enforceability of any rights or obligations that arose prior to such variation or revocation.
9. Under section 17 of the Act, where the CMA decides, as a result of a further SMS investigation under section 10 of the Act, to revoke Google's SMS designation in respect of general search services, the CMA may make transitional, transitory or saving provision in respect of the Publisher Conduct Requirement. Where the CMA decides to designate Google again as having SMS in respect of general search services, or to designate Google as having SMS in respect of a digital activity that the CMA considers to be similar or connected to general search services (whether instead of, or in addition to, general search services), the CMA may apply the Publisher Conduct Requirement to Google in respect of the new designation, with or without modification, and make transitional, transitory or saving provision in respect of the Publisher Conduct Requirement.
10. Under section 25 of the Act, the CMA must keep under review: (a) whether to vary or revoke the Publisher Conduct Requirement; (b) the extent to which Google is complying with the Publisher Conduct Requirement; (c) the effectiveness of the Publisher Conduct Requirement; and (d) whether to take enforcement action in respect of any breaches or suspected breaches of the Publisher Conduct Requirement.
11. Google is required to provide the CMA with periodic compliance reports in relation to the requirements set out in this Notice. Details of those requirements are set out in the Publisher CR Compliance Reporting Notice published on the same date as this Notice.

How the Publisher Conduct Requirement interacts with other conduct requirements imposed on Google

12. As this is the first conduct requirement imposed on Google by the CMA, there are no interactions with other conduct requirements.

Competition and Markets Authority

3 June 2026