

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 **Fair Ranking Conduct Requirement**) on Google relating to its general search services.

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

The Fair Ranking Conduct Requirement

Definitions

1. In this conduct requirement:

- a. **actionable change** means a change to Google's ranking criteria, policies or procedures in response to which publishers may take action to avoid or reduce the impact of this change on the ranking of the publisher's content;
- b. **CMA** means the Competition and Markets Authority;
- 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. **material change** means any actionable change or significant and explainable change;
- e. **publisher** means any party that makes content available on the web;
- f. **search generative AI features** means Google's generative AI-dependent features offered within general search, such as AI Overviews and AI Mode; and
- g. **significant and explainable change** means a change to Google's ranking criteria, policies or procedures (other than an actionable change) which may result in significant shifts in ranking and which Google can explain.

Scope

2. The following obligations shall apply to Google in the context of:

- a. the ranking and presentation of organic search results including web results, images and videos shown to any natural or legal persons located in the UK;

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

- b. the ranking and presentation of organic search results within search generative AI features shown to any natural or legal persons located in the UK; and
 - c. the ranking of organic search results relative to search features and/or search generative AI features shown to any natural or legal persons located in the UK.
- 3. Nothing in this conduct requirement shall apply to Google's ranking or presentation of paid-for search results, features or content.

Non-discrimination and objectivity

- 4. When making any decision related to the matters set out in paragraph 2, Google shall apply objective and non-discriminatory criteria. This means Google:
 - a. shall not take into account whether or not a publisher:
 - i. has chosen to advertise on Google;
 - ii. has entered into other commercial or contractual arrangements with Google;
 - iii. has chosen to opt out of its content being used for Google's search generative AI features or any Google service outside of general search; or
 - iv. has exercised contractual or statutory rights against Google; and
 - b. shall apply the same, objective criteria in relation to its own products and services and the equivalent products and services of third parties.
- 5. When introducing and testing new search features or new search generative AI features, Google may make decisions related to the matters set out in paragraph 2 outside of the requirement set out in paragraph 4.b. only:
 - a. for a short, initial period, limited to the minimum duration strictly necessary to determine that feature's utility and relevance within Google's organic search results and collect the data necessary to apply the relevant ranking criteria and policies and, in any event, for no longer than six months after that feature's introduction in the UK; and
 - b. to the minimum extent strictly necessary to determine that feature's utility and relevance within Google's organic search results and collect the data necessary to apply the relevant ranking criteria and policies.

Transparency

- 6. Google shall provide publicly:
 - a. sufficient information about how it undertakes the matters set out in paragraph 2; and
 - b. sufficient information in advance of any material changes that affect the matters set out in paragraph 2:
 - i. in relation to any actionable change, no less than 30 business days before it is introduced in the UK; and
 - ii. in relation to any significant and explainable change, no less than 15 business days before it is introduced in the UK.

Non-distortion and complaints

- 7. Google shall:

- a. provide clear and accessible processes for publishers to provide feedback to Google regarding the ways in which any material change has had, or may have, a material adverse distortive or other adverse impact on the functioning of any UK market in which they are active, where such impact does not reflect the purpose of the material change, as explained in information provided by Google pursuant to paragraph 6.b.; and
 - b. provide clear and accessible processes for receiving, handling and issuing substantive responses to individual reconsideration requests from publishers in relation to manual actions taken by Google in the context of any of the matters set out in paragraph 2.
8. If, within 30 business days from the date that a material change becomes effective in the UK, Google receives feedback in relation to that material change from at least 50 different publishers through the processes established pursuant to paragraph 7.a., Google shall provide sufficient details of all relevant feedback received to the CMA as soon as practicable and, in any event, within 15 business days.
9. In addition to the processes described in paragraph 7, Google shall also provide an alternative dispute settlement mechanism for publishers that have been manually excluded from Google's general search index.

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

The CMA's reasons for imposing the Fair Ranking Conduct Requirement

2. The reasons for the CMA's decision to impose the Fair Ranking Conduct Requirement are set out in the Fair Ranking 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 Fair Ranking 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 Fair Ranking Conduct Requirement is for the purpose of:
 - (i) section 20(2)(d) of the Act: requiring Google to give explanations and a reasonable period of notice to users or potential users of general search services before making changes in relation to general search services where

those changes are likely to have a material impact on the users or potential users – see paragraph 6 of the Fair Ranking Conduct Requirement;

- (ii) section 20(3)(a) of the Act: preventing Google from applying discriminatory terms, conditions or policies to certain users or potential users or certain descriptions of users or potential users – see paragraphs 4 and 5 of the Fair Ranking Conduct Requirement; and
- (iii) section 20(2)(b) of the Act: requiring Google to have effective processes for handling complaints by and disputes with users or potential users – see paragraphs 7 to 9 of the Fair Ranking Conduct Requirement.

Benefits of imposing the Fair Ranking Conduct Requirement

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

Implementation and term of the Fair Ranking Conduct Requirement

- 6. The Fair Ranking Conduct Requirement will come into force six 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 Fair Ranking 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 Fair Ranking 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 Fair Ranking 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 Fair Ranking Conduct Requirement.

10. Under section 25 of the Act, the CMA must keep under review: (a) whether to vary or revoke the Fair Ranking Conduct Requirement; (b) the extent to which Google is complying with the Fair Ranking Conduct Requirement; (c) the effectiveness of the Fair Ranking Conduct Requirement; and (d) whether to take enforcement action in respect of any breaches or suspected breaches of the Fair Ranking 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 [Fair Ranking CR Compliance Reporting Notice](#) published on the same date as this Notice.

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

12. As set out above and in more detail in the Fair Ranking CR Final Decision, a non-confidential version of which is available via the [CR page](#), the Fair Ranking Conduct Requirement focuses on how Google ranks and presents publisher content in its organic search results. It requires Google to:
 - (a) rank its organic search results based on objective and non-discriminatory criteria;
 - (b) provide transparency over how it ranks organic search results and provide sufficient notice and information about material changes that could impact businesses and reduce avoidable costs; and
 - (c) enable publishers to effectively raise concerns about manual actions and material changes that may have a material adverse distortive or other adverse impact on UK markets.
13. The Publisher Conduct Requirement, which the CMA imposed on 3 June 2026,² focuses on publisher content that Google crawls for the purposes of general search and how that content is then used, including in search generative AI features and in generative AI services outside of general search. In particular, it requires Google to:
 - (a) provide publishers with effective controls to withhold their content from use by Google in its generative AI;

² See the [Publisher CR Notice](#). It has also imposed the Data Portability Conduct Requirement on Google on the same date as this Fair Ranking Conduct Requirement. See the [Data Portability CR Notice](#). Given the different focus of the Data Portability Conduct Requirement (on the portability of end user data to third party businesses), we do not consider that it interacts with the Fair Ranking Conduct Requirement.

- (b) publish clear, comprehensible and user-friendly information explaining how publisher content is used by Google in its generative AI and to provide publishers with clear and detailed metrics on user engagement with their content in generative AI within general search; and
 - (c) take reasonable steps to ensure that publisher content is attributed clearly and accurately in general search, and that end users have a clear means to access that content, and publish clear, comprehensible and user-friendly information explaining its approach to attribution.
14. Both the Fair Ranking Conduct Requirement and the Publisher Conduct Requirement therefore impose obligations on Google in relation to its use of publisher content. While they have different focuses, the two conduct requirements may interact. For example:
- (a) paragraph 4.a.iii. of the Fair Ranking Conduct Requirement prevents Google from taking account of whether a publisher has withheld content from search generative AI features or outside of general search, which may include the use of the controls Google is required to provide pursuant to paragraphs 3 and 4 of the Publisher Conduct Requirement;
 - (b) paragraph 9 of the Publisher Conduct Requirement prevents Google from downranking publisher content in order to prevent publishers from, or penalise them for, using the controls over their content; and
 - (c) both conduct requirements contain obligations on Google to publish information about its general search results, since the Publisher Conduct Requirement obligations (paragraphs 6.a. and 8.b.) relates to how content is used in the training and grounding of generative AI features and how it ensures content is attributed, while the Fair Ranking Conduct Requirement obligation (paragraph 6.a.) relates to how it makes decisions in relation to ranking and display of search features.
15. The CMA considers that these interactions reflect the fact that these conduct requirements are complementary and do not create any conflict or risk of inconsistency.

Competition and Markets Authority

17 June 2026